

Independent Environmental Audit Silverton Wind Farm



For AGL Hydro Partnership as agent for and on behalf of PARF Company 8 Pty Ltd as trustee of the
Silverton Project Trust


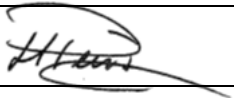

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Table of Contents

Executive Summary	ES-1
1 Introduction	1
1.1 Report Structure	1
2 Methodology	2
2.1 Audit Scope	2
2.2 Approach	2
2.3 The Proponent	3
2.4 Audit Team	4
2.5 Regulatory Approvals	4
2.6 Period of the Independent Environmental Audit	4
2.7 Initial Audit Presentation and Interviews	5
2.8 Site Inspections	5
2.9 Post Inspection Interviews	5
2.10 Documents Reviewed	6
2.11 Compliance Assessment	6
2.11.1 Criteria	6
2.12 Environmental Performance	7
3 Silverton Wind Farm	8
3.1 Site Description and History	8
3.2 Description of Site Operations	8
3.3 Activities Occurring During Site Audit Inspection	8
4 Consultation with Key Government Agencies	9
4.1 NSW Department of Planning and Environment (DPE Compliance)	9
4.2 NSW Department of Planning and Environment (DPE Post Approvals)	9
4.3 NSW Environment Protection Authority (EPA)	10
4.4 NSW Office of Environment and Heritage (OEH)	10
4.5 Broken Hill City Council (BHCC)	10
4.6 RMS	10
4.7 Essential Water	11
4.8 Silverton Wind Farm Community Consultative Committee (CCC)	11
4.9 Crown Lands	11
5 Site Inspection Observations and Photographs	12
5.1 Observations from the site inspection	31
6 Environmental Performance	34
6.1 Environmental Management Strategy	34
6.1.1 Wind Farm Work Environmental Management Strategy	34
6.1.2 Operational Environmental Management Strategy	35
6.1.3 Connection Works Environmental Management Strategy	36
6.2 Environmental Management Plans	36
6.2.1 Adequacy Review of Key Management Plans	37
6.3 Environmental Incident Management	39

6.3.1	Externally Reported Incidents	39
6.3.2	Internally reported Incidents.....	39
6.4	Complaint Management	40
6.5	Regulatory Action.....	40
6.6	Community Consultative Committee (CCC).....	40
7	Compliance Assessment and Recommendations.....	42
7.1	Non-Compliances	43
7.2	Not Verified Conditions.....	44
7.3	Continual Improvement.....	47
8	Limitations of Report	49

Appendices

Appendix A: Compliance Assessment, Project Approval 08_0022 & EPL 20882

Appendix B: NSW DPE Audit Team Approval

Appendix C: IEA Declaration Form

Tables

Table ES-1 Overall Compliance Assessment and Audit Score

Table 2-1:	Project Approval IEA Conditions	2
Table 2-2	List of Approvals, Licences	4
Table 2-3:	Compliance Assessment Criteria	6
Table 5-1	Site Inspection Photographs – Silverton Wind farm	12
Table 5-2	Site Inspection Photographs – Connection Works	27
Table 5-3	Site Inspection Photographs – Road Upgrades.....	30
Table 5-4:	Observations from the site inspection	32
Table 6-1	Adequacy Review of Key Management Plans and Programs	37
Table 7-1:	Non-compliances and Recommendations	43
Table 7-2:	Not verified conditions and Recommendations.....	44
Table 7-3:	Opportunities for Improvement.....	47

Abbreviations

Abbreviation	Description
AGL	AGL Hydro Partnership
BBAMP	Bird and Bat Adaptive Management Plan
BHCC	Broken Hill City Council
BHLALC	Broken Hill Local Aboriginal Land Council
CCC	Community Consultation Committee
CEEC	Critically Endangered Ecological Community
CoA	Condition of Approval
DPE	NSW Department of Planning and Environment
EA	Environmental Assessment
EHP	Ecology and Heritage Partners Pty Ltd
EMP	Environmental Management Plan
EMS	Environmental Management Strategy
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
EPA	Environment Protection Authority
EPL	Environment Protection Licence
ERSED	Erosion and Sediment
ESCP	Erosion and Sediment Control Plan
ESR	Environmental Site Representative
HMP	Heritage Management Plan
HSE	Health Safety and Environment
IEA	Independent Environmental Audit
IFC	Issued For Construction
MCW Environmental	MCW Environmental Consulting Pty Ltd
Minister	Minister for Planning, or delegate
mm	millimetre
NSW	New South Wales
OEH	Office of Environment and Heritage
OFI	Opportunity for Improvement
PARF	Powering Australian Renewable Fund: PARF Company 8 Pty Ltd as trustee of the Silverton Project Trust
PIRMP	Pollution Incident Response Management Plan
Project	The development as described in the EA and approved under 08_0022
Proponent	Silverton Windfarms Development Pty Limited
POEO Act	<i>Protection of the Environment Operations Act 1997 (NSW)</i>
REF	Review of Environmental Factors
RFS	Rural Fire Service
RMS	Roads and Maritime Services

Executive Summary

MCW Environmental Pty Ltd (MCW Environmental) was engaged by AGL HP1 Limited, AGL HP2 Limited, AGL HP3 Limited (as partners in the AGL Hydro Partnership, or AGL in this report, as agent for and on behalf of Powering Australian Renewable Fund Company 8 Pty Ltd as trustee of the Silverton Project Trust (PARF) to carry out an Independent Environmental Audit (IEA) of the Silverton Wind Farm located near Silverton and Broken Hill, NSW.

Project Approval 08_0022 for the Silverton Wind Farm was originally approved on 24 May 2009, and has had 3 Modifications, with Modification 3 dated December 2016.

Schedule 4, Condition 7 of Project Approval 08_0022 (MOD 3) requires AGL to commission an IEA within one year of the date of commencement of construction, and every 3 years thereafter. To this end, MCW Environmental was commissioned on 11 May 2018 to carry out an independent audit of the Silverton Wind Farm.

The audit was completed in accordance with the requirements of Schedule 4, Condition 7 of Project Approval 08_0022, the Independent Audit Guideline (NSW Government, October 2015) (Independent Audit Guideline); and MCW Environmental's proposal to conduct the work dated 8 May 2018. This is the first IEA to be conducted under Project Approval 08_0022.

The audit team was approved by the NSW Department of Planning and Environment (DPE) in a letter dated 17 April 2018.

The IEA methodology included:

- Initial discussions with AGL and its representatives to organise the audit, including the provision of documentation, the site visit and timing;
- Review of documentation provided by AGL and its representatives and preparation of compliance assessment checklists that included a list of conditions of key regulatory approvals to be assessed for compliance;
- Discussions with DPE regarding any concerns or areas for particular focus during the audit;
- Initial Interviews in Sydney with Jacobs (acting as AGL representatives) to gain an understanding of the approach in compliance with the Project Approval;
- Two-day site inspection including review of documentation and interviews with key site personnel and contractors on 18-19 June 2018;
- Further interviews in Sydney with AGL, Jacobs, Biosis, GE and consultants to TransGrid on 28 June 2018;
- Consultation with key government agencies as presented in this report;
- Review of additional documentation provided by AGL, Jacobs, CATCON, GE and TransGrid after the site inspection;
- An assessment of environmental management performance through review of: the implementation of key environmental management strategies, plans and programs; non-compliances documented in annual reporting; regulatory actions; incidents; and complaints.
- An assessment of compliance was undertaken with the conditions of Project Approval 08_0022 Approval (CoA), and the Projects Environmental Protection Licence 20882 (EPL) based on a review of documentation, observations during site inspections, interviews, implementation of management plans, incidents, complaints and regulatory action.
- Submission of a draft audit report to AGL to provide an opportunity for additional information and / or correction of fact; and
- Finalisation of the report dated 28 August 2018.
- DPE Compliance provided comments on the IEA report in September 2018. The IEA Report has been updated to address these comments.

The IEA assessed compliance with Project Approval 08_0022, EPL 20882 and management plans applicable to the Silverton Wind Farm. A detailed compliance register identifying audit findings, comments and recommendations is presented in **Appendix A**. Non-compliances identified against relevant approvals are identified and discussed in Section 7.

In addition, the scope of the audit included a review of the adequacy of the relevant strategies, plans and programs required under the Project Approval. The findings of the adequacy review are presented in Section 6.

A summary of recommended actions to improve environmental performance and compliance status are presented in Section 7.

Overall, the Project is considered to have achieved a high level of compliance with the Project Approval 08_0022 and the Environmental Protection Licence 20882. Few Non-Compliances were identified, with some of these being administrative in nature. The compliance status of some conditions was not able to be verified on the basis of information not being sufficient to make a determination of compliance. The project received only one formal complaint in July 2018, just after the audit period.

The construction of the Connection Works had been mostly completed at the time of the site visit with rehabilitation of the easement undertaken. The connection works were observed to have been left in a tidy state with no construction remnants such as stockpiles or construction waste observed in the areas sighted. Given the timing of the audit and the very dry conditions, it was too early to assess the success of rehabilitation activities undertaken. Ongoing monitoring of the rehabilitation, and monitoring and control of weeds that may impact the disturbed areas should be a focus in the ongoing management of the Connection Works easement. A recommendation has been made in relation to ensuring effective drainage along the maintenance access road to reduce the potential for erosion during rain events.

The Wind Farm construction and commissioning works were ongoing at the time of the site inspection for the audit with activities including turbine pad construction; assembly of turbines; cable installation; mechanical and electrical works and commissioning. Access roads had been constructed and the batch plant had been demobilised, with all concrete footings for turbines in place. Some rehabilitation had commenced, however, this appeared to be limited at the time of the audit site inspection comprising some laydown areas; around the operations buildings and at some turbine sites. As indicated above, given the timing of the audit and the very dry conditions, it was too early to assess the success of rehabilitation activities undertaken.

Various findings and recommendations were made in relation to erosion and sediment control; and progressive rehabilitation. The detailed findings are presented in Appendix A and in Section 7.

1 Introduction

MCW Environmental Pty Ltd (MCW Environmental) was engaged by AGL HP1 Limited, AGL HP2 Limited, AGL HP3 Limited (as partners in the AGL Hydro Partnership, or AGL in this report, as agent for and on behalf of PARF Company 8 Pty Ltd as trustee of the Silverton Project Trust (PARF) to carry out an Independent Environmental Audit (IEA) of the Silverton Wind Farm located in the Barrier Ranges of NSW near the township of Silverton about 25 km from Broken Hill, NSW.

Project Approval 08_0022 for the Silverton Wind Farm was originally approved on 24 May 2009, and has had 3 Modifications, with Modification 3 dated December 2016.

Schedule 4, Condition 7 of Project Approval 08_0022 (MOD 3) requires AGL to commission an IEA within one year of the date of commencement of construction, and every 3 years thereafter. To this end, MCW Environmental was commissioned on 11 May 2018 to carry out an independent audit of the Silverton Wind Farm.

The audit was completed in accordance with the requirements of Schedule 4, Condition 7 of Project Approval 08_0022, and MCW Environmental's proposal to conduct the work dated 8 May 2018. This is the first IEA to be conducted under Project Approval 08_0022.

The audit team was approved by the NSW Department of Planning and Environment (DPE) in a letter dated 17 April 2018.

1.1 Report Structure

The report is structured as follows:

- Section 1 provides an introduction;
- Section 2 describes the IEA methodology and scope of the IEA;
- Section 3 provides a summary of the Silverton Wind Farm operations;
- Section 4 summarises the consultation with key regulatory agencies;
- Section 5 provides observations and photographs taken during the site inspections;
- Section 6 provides an assessment of environmental management performance;
- Section 7 presents the findings of the compliance assessment including recommendations;
- Section 8 provides the limitations of the report.

Appendix A contains detailed tabulated results of the compliance assessment against the Project Approval.

Appendix B contains the letter from the DPE approving the audit team

2 Methodology

2.1 Audit Scope

The IEA was conducted in accordance with the requirements set out in Project Approval 08_0022 Schedule 4 CoA 7 as detailed in Table 2-1.

Table 2-1: Project Approval IEA Conditions

Project Approval Condition	Requirement	Where addressed in IEA
08_0022 Schedule 4 CoA 7	<i>Within one year of the date of commencement of construction, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:</i>	This Report
08_0022 Schedule 4 CoA 7 (a)	<i>Be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</i>	Section 2.3
08_0022 Schedule 4 CoA 7 (b)	<i>Include consultation with the relevant agencies;</i>	Section 4
08_0022 Schedule 4 CoA 7 (c)	<i>Assess the environmental performance of the development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL/s and/or Mining Lease/s (including any assessment, plan or program required under these approvals);</i>	Sections 5 to 7 and Appendix A
08_0022 Schedule 4 CoA 7 (d)	<i>Review the adequacy of any strategies, plans or programs required under the abovementioned approvals; and</i>	Section 6
08_0022 Schedule 4 CoA 7 (e)	<i>Recommend appropriate measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under these approvals; and</i>	Section 7
08_0022 Schedule 4 CoA 7 (f)	<i>Be conducted and reported to the satisfaction of the Secretary.</i>	
08_0022 Schedule 4 CoA 7 Note	<i>This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.</i>	Section 2.3
08_0022 Schedule 4 CoA 8	<i>Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.</i>	AGL to respond to recommendations and submit the audit report.

During discussions with DPE as part of agency consultation for the audit, no additional scope from that defined in the Approval was required by DPE.

2.2 Approach

The purpose of the IEA was to assess compliance with the conditions of Project Approval 08_0022 (CoA), and the Project's Environmental Protection Licence 20882 (EPL) as well as review the adequacy of strategies, plans or programs required under the Project Approval.

The IEA was undertaken in general accordance with:

- Post-approval requirements for State significant developments: Independent Audit Guideline (NSW Government, October 2015) (Independent Audit Guideline);
- AS/NZS ISO 19011:2014 Guidelines for auditing management systems; and
- MCW Environmental's proposal (dated 8 May 2018).

The IEA methodology included:

- Initial discussions with AGL and its representatives to organise the audit, including the provision of documentation, the site visit and timing;
- Review of documentation provided by AGL and its representatives and preparation of compliance assessment checklists that included a list of conditions of key regulatory approvals to be assessed for compliance;
- Discussions with DPE regarding any concerns or areas for particular focus during the audit;
- Initial Interviews in Sydney with Jacobs (acting as AGL representatives) to gain an understanding of the approach in compliance with the Project Approval;
- Two-day site inspection including review of documentation and interviews with key site personnel and contractors on 18-19 June 2018;
- Further interviews in Sydney with AGL, Jacobs, Biosis, GE and consultants to TransGrid on 28 June 2018;
- Consultation with key government agencies as presented in this report;
- Review of additional documentation provided by AGL, Jacobs, CATCON, GE and TransGrid after the site inspection;
- An assessment of environmental management performance through review of: the implementation of key environmental management strategies, plans and programs; non-compliances documented in annual reporting; regulatory actions; incidents; and complaints.
- An assessment of compliance was undertaken with the conditions of Project Approval 08_0022 Approval (CoA), and the Projects Environmental Protection Licence 20882 (EPL) based on a review of documentation, observations during site inspections, interviews, and implementation of management plans, incidents, complaints and regulatory action.
- Submission of a draft audit report to AGL to provide an opportunity for additional information and / or correction of fact; and
- Finalisation of the report.
- DPE Compliance provided comments on an earlier version of the IEA report in September 2018. The IEA Report has been updated to address these comments.

This report provides a summary of findings including details of non-compliances identified in the audit, and recommended actions to improve compliance status and / or environmental performance.

2.3 The Proponent

The Proponent as named on the Project Approval is Silverton Wind Farm Developments Pty Ltd. However AGL is delivering the Silverton Wind Farm project as agent for and on behalf of the project owner, PARF. Jacobs has been engaged as the project managers and owner's engineers supporting the delivery of the project. The project is being delivered under two scopes of work. This includes:

- The Wind Farm Works – construction, installation and operation of 58 wind turbines and associated infrastructure; and,
- The Connection Works – construction and operation of a 22kV wind farm substation and transmission line.

GE and Civil and Allied Technical Construction Pty Limited (CATON – a Civil Engineering Construction Company) formed a joint venture, GE-CATCON, and won the contract to deliver the wind farm works inclusive of engineering, procurement and construction of the Silverton Wind Farm. At the time of the audit CATCON were the holders of the EPL.

TransGrid were engaged to deliver the connection works comprising a 25 kilometre transmission line from an existing substation in Broken Hill and a new 220kV wind farm substation. The audit has assessed compliance with both the wind farm works and connection works and as such two sets of management plans, contractor documents and inspection records were reviewed, for the two scopes of work.

2.4 Audit Team

The IEA was conducted by the following qualified, experienced and independent auditors:

- Kate Michelmore, Auditor (AECOM)
- Helen Onus, Auditor (AECOM)
- Michael Woolley, Lead Auditor (MCW Environmental)

Michael Woolley is registered by Exemplar Global (formerly RABQSA) as a Certified Lead Auditor for Environmental Management, Site Contamination Assessment and Compliance Auditing.

The audit team was approved by the DPE in a letter dated 17 April 2018 (**Appendix B**). No additional experts were specified by the DPE as being required for the IEA.

2.5 Regulatory Approvals

Silverton Wind Farm is currently being constructed under the regulatory approvals, licences and authorisations listed in Table 2-2.

Table 2-2 List of Approvals, Licences

Regulator	Reference	Description	Date Granted, Renewed or Varied
DPE	08_0022 (MOD 3)	Project Approval - Critical Infrastructure Project	December 2016
EPA	EPL 20882	Environment Protection Licence. The EPL was varied on 23 February 2018 to include commissioning of turbines and the operational phase.	23/2/2018

This IEA has assessed compliance with these approvals as required by Condition 7 of Schedule 4 of Project Approval 08_0022. A Crown Lease exists with Crown Lands and Water. This was not assessed as part of the IEA.

2.6 Period of the Independent Environmental Audit

Modification (MOD) 3 of the Project Approval 08_0022 was granted in December 2016 and construction under 08_0022 commenced on 11 May 2017.

For the purposes of assessing compliance against 08_0022, the period being audited in this IEA is from 11 May 2017 (being the date of commencement of construction under 08_0022) to 19 June 2018 (being the last day of the site visit of this IEA). This period is referred to as the “audit period” throughout this report.

2.7 Initial Audit Presentation and Interviews

The audit team attended an initial presentation by AGL on 28 May 2018 to meet the key AGL and Jacobs personnel involved in the project and environmental management of the Project. Key aspects of the initial meeting included:

- Introduction to the various entities involved in the project including AGL, the Client's Representative (Jacobs); the various construction contractors and the operating contractors.
- Overview of community consultation and management;
- Overview of environmental management input by the various parties;
- Status of Approvals and involvement of DPE; and
- Programming the audit activities and timelines.

On 8 June 2018, initial interviews and compliance assessments were held in the Jacobs offices in Sydney. This provided: an overview of the approach to environmental management; access to documents (through direct provision by Jacobs and through access to the AGL compliance database-CMO); initial indications of how compliance was approached for the Conditions of the Project Approval. The interviews and initial compliance assessment allowed for time on site to be more efficiently focussed on the site environmental performance; and contractor focussed conditions.

2.8 Site Inspections

IEA site inspections of the Silverton Wind Farm and the Connection Works were undertaken on 18 and 19 June 2018 and included the following areas and items:

- Road and intersection upgrades required under the approval including intersections at the Barrier Highway; Silverton Highway, Daydream Mine Road and Broken Hill Bypass;
- Administration office building, and facilities including laydown, hydrocarbon storage, laydown areas, waste and recycling management area and main carpark area;
- The Substation, Operations and Maintenance (O&M) building and associated laydown areas;
- The former crushing area;
- Various Wind Farm towers across the project including in Areas 2, 4, 5, 6 and 7. Due to crane lifting works and associated exclusion zones, some towers were not accessible at the time of the site inspections. The inspection covered many of the internal access roads and cable runs across the project;
- Visits to a sample of Aboriginal and historic heritage sites (it was not feasible to visit all sites);
- Critically Endangered Ecological Community(s) (CEEC's) in Area 7;
- Representative areas along the transmission line between Broken Hill Substation and the Silverton Wind Farm Sub-station. Some areas were not accessible and hence not visited.

Interviews were held on site with the following people:

- Kyle O'Donoghue, CATCON HSE Manager
- Clare Patterson, CATCON Project Engineer
- Richard Sharp, CATCON Environmental Representative (EHP)
- Damien Wagner, AGL Environmental Representative (Jacobs)

During the IEA site inspections, the weather conditions were cool, dry and sunny with light winds. Site conditions were very dry (Intense Drought) with only 83 mm of rain recorded at Broken Hill Airport from 1 June 2017 to the date of the site visit (BOM website). The April to June period in 2018 has been the 7th driest period in Broken Hill since records began in 1887.

2.9 Post Inspection Interviews

Further interviews were held in the Jacobs Sydney office on 28 June 2018 with:

- Adam Mackett, AGL Project Manager
- Melissa Ryan, AGL
- Marina Draper, AGL Manager, Government & Community Relations
- Catherine Powers, GE Project Coordinator
- Ros Read, TransGrid Environmental Representative (Urban Perspectives)
- Robert Anderson, Principal's Engineer Project Manager (Jacobs)
- Damien Wagner, AGL Environmental Representative (Jacobs)

2.10 Documents Reviewed

AGL, Jacobs and construction contractors provided the following information for review during the IEA:

- Approved Environmental management strategy, plans and programmes
- Access to the AGL Compliance database (CMO);
- Selected site procedures and checklists;
- Selected records of inspections and audits;
- Selected records of monitoring and review;
- Selected records of competency, induction and training;
- Selected meeting minutes;
- Selected technical reports and annual reports; and
- Selected government agency correspondence.

Specific documents that were referenced during the IEA are included within the compliance assessment checklist in **Appendix A**.

2.11 Compliance Assessment

Each condition within the Project Approval and EPL was assessed for compliance for the audit period. The findings of the compliance assessment are summarised in **Section 7** and detailed compliance assessments, including verification evidence, are included in **Appendix A**. Conditions that were assessed as non-compliant and not verified, with corresponding recommendations, are provided in **Table 7-1** and **Table 7-2** respectively. Conditions that were assessed as compliant and/or where opportunities were identified for continuous improvement, are provided in **Table 7-3**.

2.11.1 Criteria

Compliance for each condition of the regulatory approval was based on the criteria in the Post-Approval Requirements for State significant developments: Independent Audit Guideline (NSW Government, October 2015) provided in Table 2-3.

Table 2-3: Compliance Assessment Criteria

Criteria	Definition
Compliant	Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit.
Not verified	Where the auditor has not been able to collect sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of sufficient verification, the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. However, the auditor could note in the report that they have no reasons to believe that the operation is non-compliant with that requirement.
Non-compliant	Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent of one or more specific elements of the regulatory approval have not been complied with within the scope of the audit.

Criteria	Definition
Not triggered	A regulatory approval requirement has an activation or timing trigger that had not been met at the time of the audit inspection, therefore a determination of compliance could not be made.
Observation	Observations are recorded where the audit identified issues of concern which do not strictly relate to the scope of the audit or assessment of compliance. Further observations are considered to be indicators of potential non-compliances or areas where performance may be improved.
Note	A statement or fact, where no assessment of compliance is required.

It is noted that the Independent Audit Guideline (NSW Government, October 2015) describes criteria for Non Compliance to include “Administrative Non-Compliance”. The guideline (October 2015) also requires that risk levels (Low, Medium or High) are assigned for non-compliances. During a workshop held by DPE for environmental auditors in April 2018, DPE Compliance indicated that they did not require that auditors apply the risk assessment approach, or distinguish compliance categories using the “administrative non-compliance” category. Further, the risk assessment approach and use of the term “administrative non-compliance” are not included in the recently issued DPE Independent Audit Post Approval Requirements (June 2018). These Requirements were issued by DPE after the commencement of the audit, hence this audit was not conducted under these requirements.

2.12 Environmental Performance

An assessment of the environmental performance of the Silverton Wind Farm was undertaken and is summarised in **Section 6**. The assessment included a high-level review of:

- Environmental management system;
- Environmental management plans;
- Compliance database;
- Environmental monitoring;
- Inspections;
- Training;
- Incidents and complaints; and
- Regulatory actions.

3 Silverton Wind Farm

3.1 Site Description and History

The Silverton Wind Farm is located in the Barrier Ranges of New South Wales (NSW) approximately 20 kilometres (km) from the South Australian border. The Site is situated approximately 3.5 km north of Silverton and 25 km north-west of Broken Hill. The wind farm involved the construction of 58 GE 3.43-130 wind turbines, access roads, 33kV electrical reticulation, 33kV substation and associated infrastructure. The project was originally approved on 24 May 2009, under Part 3A of the NSW Environmental Planning and Assessment Act 1979. The initial approved project included construction of 282 wind turbines and associated infrastructure. PA 08_0022 has been modified on three separate occasions and the project has been constructed under a consolidated consent containing additional conditions from Modifications (MODs) 1, 2 and 3. MOD 3 reduced the number of turbines to the currently approved maximum of 167 wind turbines.

MOD 1 was granted on 11 April 2014 and permitted the extension of the lapse date of the 2009 approval from May 2014 to May 2016. MOD 2 was approved in June 2016 and permitted an extension to the lapse date of 5 years. On 25 November 2016, AGL submitted a request to modify the Project Approval in order to decrease the number of turbines from 282 to a maximum of 172, while increasing the dimensions and capacity of each turbine. DPE approved the modification (MOD 3) in December 2016.

3.2 Description of Site Operations

At the time of the audit site inspection, construction of the majority of the civil, structural and electrical works had been completed with most of the remaining work relating to wind turbine installation and assembly. As at June 2018, 21 of the final 58 wind turbines had reached mechanical completion. Wind turbine commissioning activities were being undertaken and 10 turbines had been fully commissioned.

The operational phase of the project (which requires all turbines to be commissioned and a 10 day wind farm reliability test to be completed) had not commenced.

TransGrid achieved practical completion for the Connection Works on 20 February 2018. This includes the connection point at the existing Broken Hill 220kV substation, the 220kV transmission line and the Wind farm 220kV substation.

3.3 Activities Occurring During Site Audit Inspection

At the time of the audit site visit, a number of activities were observed to be occurring, as outlined below:

- Construction of turbines, in particular in Areas 2 and 7. All 58 turbine footings had been constructed.
- Commissioning of turbines. Ten (10) turbines were operating and were in various stages of commissioning.
- Construction of the Operation and Maintenance (O&M) Building.
- De-mobilisation of plant from the crushing pad. Crushing operations were complete at the time of the audit.
- Operation of Silverton substation. Some construction/ landscaping and drainage works were continuing around the substation.
- Trenching and cable laying activities.
- Rehabilitation works in some areas was occurring.
- Construction works on the transmission line had been completed prior to the audit.

Photos of the operation were taken during the site inspection in June 2018 and are provided in Section 5. The Final Layout Plan can be found on the Project's website.

4 Consultation with Key Government Agencies

As part of the audit process, MCW Environmental contacted the DPE – Post Approvals and Compliance, NSW Environment Protection Authority (EPA); NSW Office of Environment and Heritage (OEH), Broken Hill City Council (BHCC); RMS; Essential water; Department of Industry- Crown Lands and Water and the Independent Chair of the Silverton Wind Farm Community Consultative Committee (CCC) to discuss the scope of the IEA and their views on the environmental performance of the Silverton Wind Farm. Feedback provided by the regulatory agencies is summarised in this section.

4.1 NSW Department of Planning and Environment (DPE Compliance)

MCW Environmental contacted the DPE Senior Compliance Officer responsible for Silverton Wind Farm on 13 June 2018 to discuss the scope of the IEA and to gain relevant feedback on the Silverton Wind Farm for the audit. The DPE Compliance Officer reported that there were no specific compliance concerns that he was aware of and no specific additional scope to cover outside of the audit scope defined in the Project Approval. The Compliance Officer provided the following general comments:

- Key sensitivities at the site and areas to assess during the audit included: impacts on native vegetation including threatened ecological communities; potential impacts on Aboriginal sites; steepness of the land and potential erosion and sediment control risks; location of turbines and micro-siting; implementation of road upgrades as required by RMS and use of local roads to the west of the Wind Farm.
- Some concerns had been raised by a few community members, and were being addressed at CCC meetings.
- Site inspections had been undertaken by the Officer with no significant compliance issues raised during these inspections.
- To confirm if Crown Lands or RMS had any concerns particularly in regards to water crossings by access roads.
- That the project generally appeared to respond in a timely manner to matters raised by the local community.

DPE Compliance provided comments on the IEA report in September 2018. The IEA Report has been updated to address these comments.

4.2 NSW Department of Planning and Environment (DPE Post Approvals)

MCW Environmental contacted the DPE Post Approvals Officer responsible for Silverton Wind Farm on 15 June 2018 to discuss the IEA and to gain relevant feedback on the Silverton Wind Farm for the audit. The DPE Post Approvals Officer provided the following general comments:

- The AGL approach of having each contractor do separate management plans increased the total number of plans that were required to be assessed and approved;
- The overlap of the commissioning phase between Construction and Operations means that various contractors' management plans (by type) will be used concurrently.
- Key areas to include in the audit comprised:
 - Implementation of mitigation measures to protect biodiversity;
 - Coverage of post approval conditions;
 - Implementation of the various management plans; and
 - Implementation of operating conditions in the consent.

4.3 NSW Environment Protection Authority (EPA)

Feedback was sought from the NSW EPA regarding the Silverton Wind Farm. The EPA did not report any specific concerns regarding the Silverton Wind Farm and noted that the Environment Protection Licence (EPL) had been recently varied to permit the on-site activities to transition from construction activities to the wind farms operational phase, including electricity generation. The EPA had not received any complaints in relation to the Wind Farm.

4.4 NSW Office of Environment and Heritage (OEH)

Feedback was sought from Senior Biodiversity Conservation Officer Planning, South West Branch Regional Operations Division of OEH on 15 June 2018 regarding Silverton Wind Farm. OEH provided the following feedback:

“At this stage our concerns generally relate to the following:

1. Construction impacts to threatened species and ecological communities:

As set out in the draft Porcupine Grass Sparse Woodland (PGSW) Management Plan and Barrier Range Dragon Management Plans:

- *Sediment control to avoid impacts from roads uphill and adjacent to mapped areas of PGSW critically endangered ecological community.*
- *Implementation of vehicle hygiene measures to prevent weed incursion, particularly for vehicles that don't originate from Silverton.*
- *No stockpiles, laydown areas or machinery in areas mapped or meeting the criteria as habitat for the Barrier Range Dragon.*

2. Implementation of the Bird and Bat Adaptive Management Plan (BBAMP)

We understand that some turbines are operational. It is essential that the approved BBAMP is implemented, particularly (but not limited to):

- *Fauna rescue and reporting induction for all on-site staff.*
- *Reporting of dead or injured fauna and understanding of triggers for BBAMP actions.*
- *Commencement of monitoring for operational turbines.*
- *Measures for mitigating bird and bat collisions, including large animal carcass removal.”*

4.5 Broken Hill City Council (BHCC)

Feedback was sought from the Broken Hill City Council (BHCC) by phone calls and email correspondence on 4 July 2018, however no response was received.

4.6 RMS

The Manager, Land Use Assessment, Regional & Freight was contacted on 6 July 2018 and provided the following response:

“There are/were a number of intersection and road improvements required to be completed as part of the development.

These works have been completed with one exception – the site access intersection with Daydream Mine Road. Works were done on this intersection that were contrary to the approved plan and we are working with the proponent's contractor, CATCON, to agree on a different intersection design that meets their and our requirements. Importantly, the current intersection alignment is not satisfactory and is being managed under a traffic control plan that includes reducing the speed zone temporarily on Daydream Mine Road.

The other works have all been completed, however, RMS extended the liability period on these work for two years following identification of some construction deficiencies. For the purposes of your audit however, these construction deficiencies can be managed by RMS through the extension of the liability period.”

Correspondence between GE-CATCON and RMS on 29 May 2018 indicated that the proposed permanent solution would “provide a safer solution for the community....due to the significantly improved sight distances”.

4.7 Essential Water

Feedback was sought from Essential Water by phone calls and email correspondence on 14 July 2018, however no response was received.

4.8 Silverton Wind Farm Community Consultative Committee (CCC)

The Independent Chair of the CCC for the Silverton project provided the following comments during a telephone discussion on 4 July 2018:

- The Community Consultative Committee has been operating for approximately 5 years throughout the approvals and construction periods of the project. The group is collegiate, functional and productive. There is a good relationship between the group; AGL and Construction contractors. Participants know each other and feel comfortable in raising concerns at meetings.
- AGL and the construction contractors have attended meetings and where concerns have been raised by committee members they have been taken seriously. Issues raised by the group have included: truck driver behaviour soon after construction commencement; light spill at one residence; use of secondary site access; and dust. All concerns raised by members were addressed promptly and adequately.
- AGL and the construction contractors have been very transparent with project details and have initiated site inspections to members of the group and facilitated extra visits when requested.
- No concerns regarding the function of the CCC or the management of community related issues were raised by the Independent CCC Chair.

4.9 Crown Lands

The Acting Area Manager- Far West Region, Crown Regional Services NSW, Department of Industry- Crown Lands and Water was contacted for comment in July 2018. A response was received on 3 August 2018 as follows:

“The Department of Industry- Crown Lands would like the following special interest areas to be taken into account:

- *Internal road/track maintenance;*
- *Soil erosion and sedimentation control across the site (especially along tracks and around turbine sites) and compliance with the Erosion and Sediment Control Plan for the SWF; and*
- *Weed control.*

All other environmental considerations should fall within the responsibility of other government agencies- e.g. threatened species and Aboriginal cultural heritage (OEH), contamination, waste, noise, dust (EPA) etc.”

It is considered that the points raised by the agencies have been considered in the IEA Report including the compliance tables.

5 Site Inspection Observations and Photographs

The following photographs provide an indication of the observations made or referenced during the site inspections as detailed in Table 5-1. Site inspections were hosted by CATCON and Jacobs personnel.

Table 5-1 Site Inspection Photographs – Silverton Wind farm




Photo #	Comment	Photo
Photo 1.	Access to the Silverton Wind Farm site offices with transmission line on right of photo.	
Photo 2.	Silverton Wind Farm site offices	
Photo 3.	Crusher at crushing pad ready for removal. Crushing operations were complete at the time of the audit. The crushing pad was still to be rehabilitated.	

Photo #	Comment	Photo
Photo 4.	Batter at base of crusher pad.	
Photo 5.	Sediment fence below crusher pad. The sediment fence had collected sediment from the crusher pad area, however was damaged and needed to be replaced. Sediment had not been removed from behind the fence. It is considered in this environment rock checks and sediment sumps or similar may have more longevity than sediment fences.	
Photo 6.	As above.	
Photo 7.	Some sediment was observed in the drainage line below the crusher pad and sediment fence indicating movement of sediment to the creek.	





Photo #	Comment	Photo
Photo 8.	Sediment fence in downstream side of the creek (above).	
Photo 9.	Wild goats were seen commonly across the site during site inspections.	
Photo 10.	Substation in operation. Some construction/landscaping and drainage works were continuing around the substation.	
Photo 11.	Demarcation of aboriginal sites in the vicinity of the substation using flagged rope. CATCON reported that when construction was completed around these areas the flagging had been removed. As construction in this area was ongoing, the flagging was still in place.	




Photo #	Comment	Photo
Photo 12.	Operations Building under construction.	 A photograph showing the Operations Building under construction. The building is a long, low structure with a corrugated metal roof. It is surrounded by a dirt area with some construction equipment and materials. A date stamp '18/06/2018' is visible in the bottom right corner.
Photo 13.	Rehabilitated areas near the Operations Building.	 A photograph showing rehabilitated areas near the Operations Building. The area is a dirt road or path with a large, rectangular, reddish-brown area of soil that has been excavated or graded. The background shows the Operations Building and some trees. A date stamp '19/06/2018' is visible in the bottom right corner.
Photo 14.	Excavated and open trench running up the slope above the Substation.	 A photograph showing an excavated and open trench running up the slope above the Substation. The trench is a deep, narrow cut in the earth, running diagonally across the frame. The surrounding area is covered with dry, scrubby vegetation. A date stamp '18/06/2018' is visible in the bottom right corner.
Photo 15.	Drainage lines above the substation.	 A photograph showing drainage lines above the substation. The image shows a dirt road or path with a series of parallel, shallow, reddish-brown lines that have been excavated or graded. The background shows some trees and a clear sky. A date stamp '18/06/2018' is visible in the bottom right corner.





Photo #	Comment	Photo
Photo 16.	Former laydown area adjacent the substation rehabilitated by contouring and gentle rip across the contour.	
Photo 17.	Where areas were being prepared for rehabilitation, signs had been placed to avoid trafficking on these areas.	
Photo 18.	Construction of turbines in Area 2, with crane at Turbine T53.	
Photo 19.	Turbines T40 and T41 in Area 2. Note that cable trenches are on separate alignments to the access road which has increased the disturbed foot print. CATCON indicated this is required to enable the construction sequence to occur without impediment and delays.	





Photo #	Comment	Photo
Photo 20.	Disturbed areas along the access road between Area 2 and Area 7 on the western side of the Wind Farm. The areas have been lightly ripped across the contour.	
Photo 21.	Access road into Area 7 with Porcupine Grass Sparse Woodland Communities in the hill on the left of the photo.	
Photo 22.	Area 7 with Porcupine Grass Sparse Woodland Communities at T32. Flagging was observed delineating the cleared area from the Porcupine Grass Sparse Woodland Communities at this location.	
Photo 23.	Cable route from T34 to T32 cut into Porcupine Grass Sparse Woodland Communities. Flagging was observed along the access road created by the cable route. There were no erosion and sediment (ERSED) controls along the length of the access road which had a steep gradient in places. This had the potential to cause concentration of flows along the road in a rain event.	





Photo #	Comment	Photo
Photo 24.	As above. Cut and fill for cable route between T34 and T32. Some road construction material had fallen down the slope in some areas.	
Photo 25.	Cable route between T34 and T32 with flagging fallen onto the ground. In this section there was very little disturbance outside of the footprint of the cable route. Post Inspection it was reported that this cable route would be re-contoured and rehabilitated rather than left as an access track.	
Photo 26.	A number of wedge tail eagles were observed in Area 7 including what appeared to be a mating pair. Some were observed landing on recently installed aerial transmission lines.	
Photo 27.	View of T33 from T32. Some dust was observed to be generated from vehicles on roads, however it is considered impracticable to water all access roads particularly given severe water shortages in the area.	





Photo #	Comment	Photo
Photo 28.	Cable line cut into ground separate to access road. It was reported that this is usual practice in wind farm construction. CATCON indicated that it was not possible from a logistics and timing perspective to install cables along the road access which would minimise the footprint of disturbance.	
Photo 29.	A goat fence has been installed for a section of the site. Jacobs indicated this fence was installed under a grant separate to the Wind Farm project.	
Photo 30.	Water cart operating along some roads where works were taking place.	
Photo 31.	Access road along a rocky ridge to T31 in Area 7 containing Porcupine Grass Sparse Woodland Communities. It was noted the disturbance footprint had been minimised along this section with very little disturbance noted outside the access road footprint.	

Photo #	Comment	Photo
Photo 32.	Foundation of T31 in Area 7 amongst Porcupine Grass Sparse Woodland Communities.	 A photograph showing the foundation of tower T31, a large concrete pad, situated in a cleared area of Porcupine Grass Sparse Woodland. A yellow excavator is visible in the background. The date stamp '19/06/2018' is in the bottom right corner.
Photo 33.	Flagging observed around the base of T31 to indicate the disturbance footprint. In places the batter from the construction of the tower laydown area had intruded past the flagging. CATCON indicated that Biosis record the disturbance areas prior to the works and set out flagging. Following the works Biosis re-survey the disturbed areas and take into account where the disturbance has been greater than that set out with flagging. The area of disturbance is added to the disturbance register.	 A photograph showing a yellow bulldozer working on a rocky slope. Red flagging is visible on the ground, indicating the disturbance footprint. The date stamp '19/06/2018' is in the bottom right corner.
Photo 34.	As above. Flagging on the batter at T31.	 A photograph showing a rocky slope with red flagging placed along its edge. The date stamp '19/06/2018' is in the bottom right corner.
Photo 35.	Water cart observed wetting roads for dust management.	 A photograph showing a white water cart driving on a dirt road, spraying water to manage dust. The date stamp '19/06/2018' is in the bottom right corner.





Photo #	Comment	Photo
Photo 36.	<p>Access Road and cable run to T53 in relatively steep areas. Limited proactive drainage measures were observed on the road or the cable run.</p> <p>CATCON indicated that measures would be installed if rain was forecast. The cable run was yet to be rehabilitated</p>	
Photo 37.	<p>Typical tower set up with large footprint required for crane pads and blade storage (for all three blades) prior to lifting in place. Additional disturbance due to roads and cable runs. Towers located on steeper ground required additional areas for batter slopes.</p>	
Photo 38.	<p>Heritage site SU53/HS1 (the Blue Anchor Tank) requiring protection under Condition 20 (Schedule 3) of the Project Approval. There was no observed impact to the item and it was some distance from work areas.</p>	
Photo 39.	<p>Water supply pipeline to Broken Hill. No impact to the pipeline was observed from CATCON works at this location.</p>	




Photo #	Comment	Photo
Photo 40.	Looking towards T58, the closest turbine to Silverton. Cable run on the right and access road to the left.	
Photo 41.	Open trench covered with ATF fencing. This trench appeared to be open more than just overnight.	
Photo 42.	There were a number of laydown areas and materials handling areas across the site. These will all require rehabilitation post construction.	
Photo 43.	Looking north towards Areas 4 and 5.	

Photo #	Comment	Photo
Photo 44.	<p>A steep section of road in the northern section of Area 6 heading towards Area 4 (named locally as the dipper).</p> <p>Erosion and sediment controls were limited. Drainage lines off the road required improved protection to minimise erosion.</p>	 <p>A photograph showing a dirt road curving up a steep, eroded hillside. The road surface is light-colored, and the surrounding soil is dark brown and exposed. A date stamp '19/06/2018' is visible in the bottom right corner.</p>
Photo 45.	<p>Piles of rock for Barrier Range Dragon habitat in Area 4.</p>	 <p>A photograph showing a large pile of dark, jagged rocks on a hillside. The rocks are piled up next to a dirt road. A date stamp '19/06/2018' is visible in the bottom right corner.</p>
Photo 46.	<p>Section of cable run in Area 4. It is understood this has been rehabilitated and is in a final landform. The soils have been lightly ripped across the contour.</p>	 <p>A photograph showing a dirt road or cable run on a hillside. The road surface is light-colored, and the surrounding soil is dark brown and exposed. A date stamp '19/06/2018' is visible in the bottom right corner.</p>
Photo 47.	<p>Batter protection observed for low point drainage on road in Area 4. This showed a positive approach to designing erosion and sediment controls in this section of road.</p>	 <p>A photograph showing a dirt road on a hillside. The road surface is light-colored, and the surrounding soil is dark brown and exposed. A date stamp '19/06/2018' is visible in the bottom right corner.</p>

Photo #	Comment	Photo
Photo 48.	At this low point in the road the batter was not well protected and some erosion was observed below where flows have been concentrated. A silt fence had been placed in the area. More permanent controls such as checks from rock would have more longevity.	
Photo 49.	Areas signed to be closed for rehabilitation planning.	
Photo 50.	Installation of turbine blades on T23 in Area 5.	
Photo 51.	View of crane pad at T22 and towards Area 5. The location of this pad was immediately adjacent a rocky outcrop.	



Photo #	Comment	Photo
Photo 52.	Looking south across Area 4 and 5. The landform is less steep than other areas of the wind farm such as Area 7.	
Photo 53.	Sign for Heritage zone near T14 and T15 in Area 5. CATCON stated that they are progressively changing from flagging to signs as markers for these areas as construction activities adjacent the sites are completed.	
Photo 54.	Barrier Range Dragon habitat in Area 4 near T8. Two star pickets were sighted as evidence of former protection for the area. No damage to the area or signs of regular access were observed, noting it was well off the access road.	
Photo 55.	Aboriginal heritage site near T9 was sighted with flagging on star pickets. CATCON stated that they were progressively changing from flagging to signs as markers for these areas.	




Photo #	Comment	Photo
Photo 56.	<p>While most sites were still under construction, the area around T50 was reported to have been rehabilitated. The landform around the tower pad had been re-contoured. The crane pads were reported to remain as is for future maintenance purposes.</p> <p>It was not able to be determined from the site inspection if topsoils/surface cover had been kept and were re-spread over the areas to promote rehabilitation from the existing seed bank. This aspect of topsoil separation was discussed verbally onsite with GE CATCON's environmental representative (Richard Sharpe) who reported that it occurred during his review of clearing practices.</p>	
Photo 57.	<p>The main access road into the site crossed a drainage line/creek with no apparent culvert or pipe for the creek to flow in. Post the inspection, CATCON's designers indicated that the designed causeway was still to be constructed in this area. Given the large size of the catchment to this area, any significant rain event in the current state has a potential to wash out the access road.</p>	
Photo 58.	<p>Cable run above the substation. No visual evidence of salvaging the top layer of soil containing the seedbank (e.g. wind row or stockpile of topsoils) was evident at this location.</p> <p>This aspect of topsoil separation was discussed verbally onsite with GE CATCON's environmental representative (Richard Sharpe) who reported that it occurred during his review of clearing practices.</p>	

Table 5-2 Site Inspection Photographs – Connection Works





Photo #	Comment	Photo
Photo 59.	Substation at Broken Hill with transmission line crossing the Broken Hill railway line. Construction works on the transmission line had been completed prior to the audit.	
Photo 60.	Transmission line crossing the Broken Hill railway line (looking away from Broken Hill). The Broken Hill Solar Plant transmission line is on the right.	
Photo 61.	Access track under transmission line near Pole 76. Jacobs stated disturbed areas have been rehabilitated by lightly ripping soils.	
Photo 62.	Areas rehabilitated under the transmission lines were free of stockpiles and left in a neat condition. As above, soils were lightly ripped to provide a rough uncompact surface.	








Photo #	Comment	Photo
Photo 63.	Transmission line crossing the Barrier Highway. An access track follows most of the transmission line route.	
Photo 64.	Creek crossing at Pole 41.	
Photo 65.	<p>Creek crossing at Pole 41. It is understood that the creek was stabilised for vehicular access. There did not appear to be significant disturbance to the creek.</p> <p>However, it was observed that there was a long run along the access road to the creek without any diversions sending runoff water off the road. Given this, there is a potential for water to concentrate on the road leading to scouring on the road access to the crossing.</p>	
Photo 66.	There remains areas along the transmission line that have been rehabilitated, however with the very dry conditions no growth has been observed. It may take a long time for these areas to rehabilitate and will be weather dependent.	

Photo #	Comment	Photo
Photo 67.	Pole 43 where it was reported that a large area was required for cable management during construction. As per other sites, the area was left in a lightly ripped state with no stockpiles or rubbish observed.	
Photo 68.	Transmission line looking east from Pole 44. The access track is directed down a slope with no proactive drainage measures installed to direct water off the road. There is a potential for runoff water to concentrate down the track leading to potential erosion/scouring of the track and associated sediment deposition.	
Photo 69.	Looking west from Pole 44. Similar issues to above were observed on other areas of the access track that had more gentle slopes between Poles 41 and 44.	
Photo 70.	Transmission Line crossing the Silverton Highway.	

Table 5-3 Site Inspection Photographs – Road Upgrades

Photo #	Comment	Photo
Photo 71.	Intersection at Magazine Way and Silverton Highway.	
Photo 72.	Passing Lane constructed on Silverton Highway.	
Photo 73.	Intersection of Silverton Road and Daydream Mine Road	

Photo #	Comment	Photo
Photo 74.	Intersection of site access road and Daydream Mine road.	
Photo 75.	Over dimensional turn off from Barrier Highway to Broken Hill Bypass.	
Photo 76.	Broken Hill Bypass road for over dimensional vehicles.	

5.1 Observations from the site inspection

Observations made during the site inspection are summarised in Table 5-4 . Recommendations related to the findings are included in the compliance tables and is Section 7 of this report.

Table 5-4: Observations from the site inspection

Item	Finding
1	<p>CATCON has constructed over 70km of internal access roads in very steep, rocky and challenging terrain. The access roads will remain for the operational and decommissioning life of the project. In many areas permanent drainage controls to manage long term erosion and sedimentation risks related to the access roads did not appear to have been fully installed e.g. stabilised drains; rock checks in drains; redirection of water off roads; batter chutes; etc. In areas further developed (such as the northern section of Area 6), some structures including batter protection were observed. Over the construction period there has been very little rainfall to test current erosion and sediment controls and no significant erosion and sediment impacts from roads were observed.</p> <p>It is noted that the BMP Section 5.9 and the CATCON CEMP (Sub-Plan 5) include actions to implement erosion and sediment controls. These are high level and do not specify the type and extent of controls, other than to refer to the Blue Book. Controls as defined in the Blue Book were not observed to be installed in many places across the site at the time of the audit site inspection. The issues are further discussed in the compliance table for SH3COA16.</p>
2	<p>Numerous cable runs were observed on steep ground with a high potential for wash out or erosion issues in the event of rain. There were limited erosion and sediment controls installed as temporary measures prior to rehabilitation. As above, given the dry conditions no notable rain events causing erosion have occurred to date.</p> <p>CATCON reported that the approach would be to install controls in the event that rain was forecast. This may be sufficient for small areas, however with the extent of open works observed it is not considered feasible to address the risks in such a short timeframe. It is acknowledged that as the cable runs are rehabilitated, the extent of the issue will diminish, as long as slope stabilisation and suitable drainage is installed as part of the rehabilitation effort.</p> <p>See also commentary above for Item 1 and further discussion in the compliance table for SH3COA16.</p>
3	<p>Details of what had been rehabilitated on site and what was still to be rehabilitated was not clear during the site inspection.</p> <p>Further, it was unclear if the topsoils containing the seed bank had been separated and salvaged during clearing works for spreading over rehabilitated surfaces to promote revegetation. This aspect of topsoil separation was discussed onsite with GE CATCON's environmental representative (Richard Sharpe) who reported that it occurred during his review of clearing practices. A stockpile of topsoil was sighted for the crusher area, however not for other cleared areas.</p> <p>It is acknowledged that the depth of topsoil is limited in this area, however does contain the seed bank. Rehabilitation is further discussed in Appendix A under SH3COA36.</p>
4	<p>Large cleared and disturbed areas such as the crusher pad and laydown areas did not appear to have effective ERSED controls. Some sediment fences were observed, however were sometimes not well installed (not dug in); were in the wrong places (away from drainage lines), or had deteriorated in the sun.</p> <p>See also commentary above for Item 1 and further discussion in the compliance table for SH3COA16.</p>
5	<p>Formal permanent water crossings were not installed at some key locations such as the main access between the Batch Plant and the substation. Correspondence from the designers WGA indicated that a culvert was to go into at this location and noted <i>"Access road runs along water course and is only 0.3m above natural level– potential for significant scouring and flooding of the access road."</i> Given this it is considered appropriate that an assessment be conducted to ensure that designed controls (culverts and drainage lines etc.) are installed as required (by the design) across the site.</p>
6	<p>Very few weeds were observed during the site inspection or reported by CATCON. Weeds may not become evident until sufficient rainfall occurs.</p>
7	<p>It was observed that the access track for the Connection Works in some places is directed down slope with limited or no proactive drainage measures installed to direct water off the road. Hence, there is a potential for runoff water to concentrate down the track and cause erosion/scouring of the track with associated sediment deposition in these areas.</p> <p>See also commentary above for Item 1 and further discussion in the compliance table for SH3COA16.</p>
8	<p>The sediment fence had collected sediment from the crusher pad area, however was damaged and needed</p>

Item	Finding
	to be replaced. Sediment had not been removed from behind the fence. It is considered in this environment rock checks and sediment sumps or similar may have more longevity than sediment fences.
	See also commentary above for Item 1 and further discussion in the compliance table for SH3COA16.
9	Goats were observed as being active and common across the Wind Farm site.
10	Flagging to demarcate disturbed areas from undisturbed areas had fallen down in places or was not present. As areas have been completed, use of flagging has been reduced.
11	Some seed was observed to have been collected on site to for rehabilitation purposes by the EHP environmental consultant. The volume of seed however was considered minimal in comparison to the significant areas of rehabilitation required to be conducted. An increased rate of collecting seed is considered to be required in order to have sufficient seed for rehabilitation, particularly in light of not being able to establish that topsoils were salvaged and re-used for rehabilitation.
12	Given the very dry conditions, the rehabilitation that had been conducted comprised contouring of soils back into the landform. There had not been sufficient time, nor rainfall, to promote growth in rehabilitated areas, hence it was too early to assess the success of rehabilitation in rehabilitated areas.
13	In the majority of rocky and CEEC areas, it appeared that efforts had been made by CATCON to minimise the footprint of the access road network. Cable runs were constructed separately to the access roads in order to reduce construction and program issues.

6 Environmental Performance

This section assesses the requirement of the scope of works to “*assess the environmental performance of the development*”. Measurement of environmental performance in this audit has been assessed by:

- An assessment of compliance with the conditions of the Project Approval; and EPL including the performance measures detailed in the Project Approval. This is detailed in Section 7 and in Appendix A;
- A review of the relevant environmental management plans still being implemented on site; and
- An assessment of regulatory action, environmental incidents and complaints as an indicator of environmental performance.

This Section also fulfils the audit scope requirement to assess the adequacy of strategies, plans or programs required under the Project Approval. The implementation of the management plans / programs is discussed in **Appendix A**.

6.1 Environmental Management Strategy

AGL has in place an Overarching Environmental Management Strategy (OEMS, 5 May 2017) for the Silverton Wind Farm Project. The Overarching EMS outlines that the Silverton Wind Farm is planned to be delivered under two scopes of work, that being the Wind Farm Works (inclusive of construction and operation) and the Connection Works. As a result the project operates separate EMS' inclusive of the following:

- The Wind Farm Works Environmental Management Strategy (WEMS) i.e. construction EMS;
- The Operational EMS (OpEMS); and
- The Connection Works EMS (TransGrid)

6.1.1 Wind Farm Work Environmental Management Strategy

Ecology and Heritage Partners (EHP) developed the WEMS on behalf of GE-CATCON. This WEMS included environmental management measures for the period of construction and was approved by the DP&E on 05 May 2017. The initial version of the WEMS did not cover Area 7, which included wind turbines T28 and T35, underground and overhead electricity transmission lines and internal roads in the Porcupine Grass Sparse Woodland. In December 2017, DPE approved commencement of construction in Area 7 and on 12 March 2018 DPE approved the revised WEMS which included reference to the works conducted in Area 7.

The strategic framework for the works is outlined in Section 2 of the WEMS and provides context for the environmental management system implemented during construction of the wind farm works. This section outlines the framework of documents for the construction works and included the following management plans:

- Construction Environmental Management Plan (CEMP)
- Road Upgrade and Maintenance Strategy
- Final Layout Plans
- Biodiversity Management Plan
 - Porcupine Grass Sparse Woodland Recovery Plan
 - Barrier Range Dragon Management Plan
 - Goat Management Plan
 - Vegetation Management Plan (located in the Operational Biodiversity Management Plan)
 - Bird and Bat Adaptive Management Plan (to be issued prior to the erection of any wind turbines)
- Heritage Management Plan
- Traffic Management Plan

Section 1.6 of the Environmental Management Strategy documents the statutory approvals that apply to the development including: Project Approval and EPL and Section 3 of the WEMS outlines the responsibilities and accountabilities for key positions, including the Consortium Project Manager, Site Construction manager, QSE Manager, HSE Advisor (construction), HSE Manager (Electrical), Environmental Consultant, Turbine Supplier EHS Manager and Ecologist (Biosis – Area 7).

The WEMS provides:

- Measures for keeping the local community informed, including an outline of the CCC meetings, the project website and the public register for the sites EPL.
- Management measures with relation to pollution complaints.
- Details of the dispute resolution process.
- An outline of the process for dealing with non-compliances with project approval conditions, the project EPL and management plans.
- Reference to emergency management outlining that emergencies will be managed in accordance with the Silverton Wind Farm Emergency Response Plan and Pollution Incident Response Plan.
- A reference to the strategies and management plans required under the wind farm's Project Approval
- A summary of the environmental monitoring and reporting required during construction of the Wind Farm Works.

It is considered that the WEMS is generally consistent with the requirements of the Project Approval. It is noted that Section 2 discusses the Porcupine Sparse Grassland Recovery Plan; the Goat Management Plan; and the Vegetation Management Plan and their submission dates as Draft documents to DPE.

No other issues with the adequacy of the Strategy were identified during the audit. It is noted that as construction activities were coming to an end; commissioning activities were ongoing and activities were shifting towards operations, it is considered that there is little value in revising the WEMS as it will soon be superseded by the OpEMS.

6.1.2 Operational Environmental Management Strategy

In June 2017 EHP commenced development of an operational EMS (OpEMS) which follows on from the Overarching EMS. The OpEMS follows the same format of the WEMS however covers the operational aspects, specifically the servicing and maintenance of the wind farm. The OpEMS states that the plan will be implemented from March 2018 (when testing and commissioning of the wind turbines was expected to begin).

Section 2 outlines the framework of documents for the operation of the wind farm and included the following management plans:

- Operations Environmental Management Plan
- Biodiversity Management Plan
 - Porcupine Grass Sparse Woodland Recovery Plan
 - Barrier Range Dragon Management Plan
 - Goat Management Plan
 - Vegetation Management Plan
 - Bird and Bat Adaptive Management Plan
- Heritage Management Plan

The OpEMS was approved by the DPE on the 21 December 2017.

It is considered that the OpEMS is generally consistent with the requirements of the Project Approval. The following recommendations are made following the adequacy review of the OpEMS:

- **2018 IEA OFI 01:** Whilst the OpEMS discusses monitoring and reporting, and commits to reporting by GE to AGL it is not clear what external reporting will be undertaken. Table 1 and 2 which summarise the monitoring requirements and reporting obligations of the MOD 3 project approval could also outline where / to whom the results will be reported and at what frequency the reporting will occur.
- **2018 IEA OFI 02:** The table references throughout the OpEMS are incorrect and not synced with the table of contents. In addition the in-text references to tables throughout the OpEMS are not correct.

6.1.3 Connection Works Environmental Management Strategy

The Connection Works EMS was developed by TransGrid and was approved by DPE on 31 May 2017. The TransGrid EMS was prepared only for the construction component of the project and states that it will be updated to incorporate the operational aspects of the connection infrastructure following construction.

Section 4 of the EMS details the construction sub-plans for the connection works. These included following management plans:

- Construction Environmental Management Plan, including:
 - Air Quality Management Plan
 - Noise and Vibration Management Plan
 - Soil and Water Quality Management Plan
 - Construction Compound and Ancillary Facilities Management Plan
- Construction Traffic Management Plan
- Heritage Management Plan
- Biodiversity Management Plan

As construction activities associated with the Connection Works had largely been completed at the time of the audit, a detailed review of the adequacy of the EMS was not undertaken.

The EMS states that it will be updated for operations post construction. This is supported by the auditors. The following could be considered in the Operations EMS:

- **2018 IEA OFI 03:** The EMS does not clearly describe the procedures that would be implemented to receive, handle, respond to and record complaints. The EMS, in section 4.4.2, indicates that complaints from the community would be managed by AGL. This is consistent with the OpEMS however no complaints line or process for dealing with complaints is provided in the Connection Works EMS. Reference to the project website for phone and email details is all that is provided.
- **2018 IEA OFI 04:** Include clear performance Objectives and Targets for rehabilitation of disturbed areas.

6.2 Environmental Management Plans

GE-CATCON and TransGrid have developed the required management plans and programs to support the implementation of their Environmental Management Strategy's and to fulfil the requirements of the Project Approval.

At the time of the IEA the following management plans had been developed and/or updated under 08_0022 and submitted to DPE for approval, however only those indicated had been approved:

- Wind Farm Works:
 - Biodiversity Management Plan, February 2018 (**approved 12 March 2018**)
 - Bird and Bat Adaptive Management Plan, March 2018 (**approved 02 May 2018**)
 - Heritage Management Plan, February 2018 (**approved 12 March 2018**)
 - Traffic Management Plan, August 2017 (**conditionally approved on 5 May 2017**)
 - Road Upgrade and Maintenance Strategy, August 2017 (**conditionally approved on 5 May 2017**)

- Connection Works:
 - Construction Biodiversity Management Plan, May 2017 (**approved 31 May 2017**)
 - Construction Heritage Management Plan, May 2018 (**approved 31 May 2017**)
 - Construction Traffic and Access Management Plan, December 2017 (**10 November 2017**)

It is understood that since this time there has been further development of Operational Plans. These have not been assessed as part of this IEA.

6.2.1 Adequacy Review of Key Management Plans

An assessment of the general adequacy of key management plans was undertaken and is provided in Table 6.1. It is noted, however, that MCW Environmental did not undertake a detailed or technical assessment of these management plans. The compliance assessment in Appendix A has assessed the Plans against the Project Approval requirements. Auditors have only covered the current CATCON plans still being implemented in this section as construction works have been essentially completed for the Connection Works.

Table 6-1 Adequacy Review of Key Management Plans and Programs

Management Plans and Programs	Adequacy Review and Opportunities for Improvement
Biodiversity Management Plan (March 2018)	<p>To satisfy the requirements of Condition 18, Schedule 3 of PA 08_0022, AGL was required to prepare a biodiversity management plan (BMP) prior to the commencement of construction. The BMP was last updated in February 2018 to address construction activities occurring in Area 7 and the increased disturbance area to the porcupine Grass Sparse Woodland.</p> <p>The auditors conducted a review of the BMP and identified that the initial BMP approved by DPE on 05.05.17 did not include a Porcupine Grass Sparse Woodland Recovery Plan, Vegetation Management Plan or Goat Management Plan. These plans were later submitted to the DPE for approval however had not been approved at the time of the audit and were not reviewed by the auditors.</p> <p>It is considered that the BMP generally addressed the requirements of PA 08_0022 (other than containing the plans as mentioned above) however did not include sufficient detail regarding rehabilitation or erosion and sediment control. Section 5.1 commits to undertaking progressive rehabilitation as soon as reasonably practicable however the BMP was not clear as to what standard or criteria the sites are to be rehabilitated to; how rehabilitation would be signed off as being sufficient; what monitoring of rehabilitation would be undertaken or when rehabilitation would be completed. The BMP was not specific that topsoils (that include the seedbank) would be separated, salvaged and re-instated over rehabilitated areas. This is a key to successful rehabilitation. The following recommendation has been made with regards to the BMP:</p> <ul style="list-style-type: none"> • 2018 IEA REC 08 - Develop a documented approach with input from suitable experts for the ongoing rehabilitation of the site. This should define rehabilitation criteria over time; what would be done if rehabilitation fails; methods for signing off when rehabilitation has reached agreed rehabilitation criteria; and define progressive rehabilitation approaches. It is noted that the Draft Vegetation Management Plan addresses some aspects of this recommendation. • 2018 IEA OFI 05 – Provide further detail in the plan (Section 5.9) in relation to the detail of erosion and sediment controls required. Current directions are generic and not easily interpreted as to what is expected.

Management Plans and Programs	Adequacy Review and Opportunities for Improvement
Bird and Bat Adaptive Management Plan (March 2018)	<p>The Bird and Bat Adaptive Management Plan (BBAMP) was developed to address the requirements of Condition 19, Schedule 3 of PA 08_0022 which required a BBAMP to be prepared prior to the commencement of construction. GE-CATCON contractor Biosis developed the BBAMP which was conditionally approved in November 2017. The BBAMP was subsequently updated in March 2018 to address comments made by OEH. DPE approved the revised version of the BBAMP in May 2018.</p> <p>The auditors reviewed the BBAMP and consider that it addresses the requirements of PA 08_0022. The auditors however are not bird and bat experts hence are not trained or experienced to provide technical comment on the plan. It is noted that the plan was developed by bird and bat experts and reviewed by the OEH expert prior to DPE Approval.</p>
Heritage Management Plan (Feb 2018)	<p>To address the requirements of Condition 21, Schedule 3 of PA 08_0022 the Heritage Management Plan (HMP) was developed and initially approved by DPE on 05 May 2017. The HMP was updated and re-submitted for approval in February 2018 following request from the DPE to update the plan with regards to the additional construction occurring in Area 7. DPE approved the revised HMP on 12 March 2018.</p> <p>The auditors reviewed the HMP and considered that it adequately addresses the requirements of PA 08_0022. The following opportunities for improvement have been identified with regards to the HMP:</p> <ul style="list-style-type: none"> • 2018 IEA OFI 18 - Update the Wind Farm Works HMP to include new items identified since March 2018 (both maps in Appendix B and list in Appendix C) • 2018 IEA OFI 17 - Conduct a reconciliation of which heritage items were impacted and update the Wind Farm Works HMP to reflect this
Road Upgrade and Maintenance Strategy (Aug 2017)	<p>The Road Upgrade and Maintenance Strategy (RUMS) was prepared to address the requirements of Condition 24, Schedule 3 of PA 08_0022 which required the RUMS to be prepared prior to carrying out any construction, or decommissioning of the project. DPE approved the RUMS on 5 May 2017 subject to a number of actions being addressed. It is unclear if the additional conditions set by the DPE in the letter dated 05.05.17 have been actioned.</p> <p>Aside from the additional requirements requested by DPE in the conditional approval letter in May 2018, the RUMS is considered to adequately address the requirements of Condition 24, Schedule 3 of PA 08_0022.</p> <p>The following recommendation has been made with regards to the RUMS:</p> <ul style="list-style-type: none"> • 2018 IEA REC 04 - Ensure the RUMS has been updated to document the outcomes of the actions identified by the DPE in its approval of the Strategy.

Management Plans and Programs	Adequacy Review and Opportunities for Improvement
Traffic Management Plan (Aug 2017)	<p>The Transport Management Plan (TMP) was prepared to address the requirements of Condition 27, Schedule 3 of PA 08_0022 which required a TMP to be prepared prior to the commencement of construction. The TMP was conditionally approved along with the RUMS on 05 May 2017 subject to a number of actions being addressed. As detailed against the RUMS above the auditors were unable to verify if these additional requirements stipulated by DPE had been addressed.</p> <p>Table 1.2 of the TMP details the project approval requirements and identified where in the TMP each condition has been addressed. It is noted that the TMP states that Conditions 27(a) (b) and (d) are addressed in Section 1.1 of the TMP. Section 1.1 outlines the purpose and scope of the document and reproduces the project approval condition requirements. Section 1.1 does not adequately address these conditions. It is noted however that most of the requirements of the TMP have been addressed throughout the document.</p> <p>Condition 27(b) requires the plan to detail measures that would be implemented to ensure the project does not disrupt the use of any travelling stock routes on site. It is unclear from review of the TMP if the project interferes with any travelling stock routes on site as the TMP does not outline where the stock routes are and if they interfere with the project.</p> <p>The following recommendations / opportunities for improvement have been made with regards to this plan:</p> <ul style="list-style-type: none"> • 2018 IEA REC 05 - Ensure the TMP has been updated to document the outcomes of the actions identified by the DPE in its approval of the Plan. • 2018 IEA REC 06 – Ensure the TMP adequately addresses the requirement to not disrupt travelling stock routes. Reference to travelling stock routes on site should be made and if applicable include the measures to be implemented to avoid disruption to those located on site. • 2018 IEA OFI 07 – Update Table 1.2 of the TMP to ensure the ‘Addressed How?’ column reflects where the condition is actually addressed in the document.

6.3 Environmental Incident Management

6.3.1 Externally Reported Incidents

There were no externally reported incidents or non-compliances during the audit period. No reporting of incidents was required under Condition 5, Schedule 4 of the Project Approval.

6.3.2 Internally reported Incidents

The Hazard and Incident Register (SF-12, May 2018) and the Incident Action Register and Tracker (STWF-27, May 2018) were reviewed by the auditors. The Hazard and Incident Register includes environmental and property damage incidents as well as near misses. No incidents which caused or threatened to cause material harm to the environment were recorded during wind farm works. Various minor environmental incidents were reported internally as required under the GE-CATCON CEMP. Incidents are reported using the CATCON Hazard and Incident Report form (SF-08). Three internal environmental incident reports were viewed by the auditors. These included an additive spill (hydrocarbon) in August 2017, a hydrocarbon spill in May 2018 and a near miss involving a 200 Litre drum of oil in April 2018. The Hazard and Incident Report form includes details of the immediate actions taken after the incident. The Project Manager's review and actions requires that the Project Manager provide comments and put in place corrective actions resulting from the incidents. Corrective Actions to address incidents are detailed in the Incident Action Tracker which also details

the responsible person, due date, completed date, evidence obtained, close out status and comments. The Incident Action Register and Tracker last revised in May 2018 was reviewed by the auditors.

TransGrid contractor incident and notification forms were viewed by the auditors. No environmental incidents were reported which would constitute material harm to the environment. Two hydraulic oil spills were reported by CPP and NJH contractors. CPP reported a hydraulic oil spill (between 10 to 15 litres) in November 2017 and NJH reported a minor hydraulic oil spills in January 2017.

6.4 Complaint Management

AGL operates a Community Information and Complaints line and is set up to receive complaints for the project. The AGL website indicates the following:

“If you would like to enquire or make a complaint about Silverton Wind Farm, please feel free to contact us via the following channels:

AGL Community Complaints & Enquiries Hotline: 1800 039 600

Email: AGLCommunity@agl.com.au

Mail: AGL Community Complaints & Enquiries, Locked Bag 3013, Australia Square NSW 1215

You can find out more about how AGL engages with the community here and access the Community Complaints and Feedback Policy [here](#).”

The project reported that there had been no complaints reported within the audit period to 19 June 2018). The Project did receive one formal complaint raised to the National Wind Farm Commissioner who forwarded on the details to AGL on the 11 July 2018. The complaint related to potential disruption to telecommunication signals, road maintenance and repair and visual amenity. AGL's response to the National Wind Farm Commissioner indicated that it contacted the complainant by email and phone on a number of occasions since receiving the complaint. A formal response was provided by letter dated 9 August 2018 which provided a response to each of the complainant's issues and a proposed resolution plan to address each concern.

It is acknowledged that the CCC meeting is a focus of the local communities who would likely raise concerns there. Submissions made at these meetings would be covered in the management of the CCC meetings and not through the AGL complaints management process.

6.5 Regulatory Action

AGL and its contractors indicated that there has not been any regulatory action taken in relation to the Project.

6.6 Community Consultative Committee (CCC)

AGL established the Silverton Wind Farm Community Consultative Committee (CCC) in 2012 following its acquisition of the Silverton Wind Farm development rights. Initially CCC meetings were held quarterly until 2013 when the meetings were reduced to half yearly. In Feb 2016 the CCC was reinvigorated and since then meetings have been held every two months. Minutes of the CCC meetings as well as the presentation provided to the CCC were available on the AGL Silverton Public Website. The CCC meetings, held by AGL, cover both the wind farm works and connection works and include representatives from both TransGrid and GE-CATCON.

Discussions were held (see Section 4.8 of this report) with the Independent Chair of the CCC. She noted that the CCC has been running successfully over its period and provides a good forum for interaction between the Proponent; construction contractors the community of Silverton.

Based on a review of the CCC presentations and minutes it is apparent that:

- Community members have an opportunity at the meetings to raise their concerns and that these concerns have been responded to by the Proponent/Contractors;

- Important and up to date information has been provided at the CCC to ensure the community is informed of relevant project information and how the Proponent is addressing their obligations under the Project Approval; and
- The CCC will continue to function into the Operational Phase of the project.

7 Compliance Assessment and Recommendations

The findings of the IEA compliance assessment for conditions within the selected regulatory approvals listed in Section 2.5 are presented in this section. The detailed compliance assessments, including verification evidence, are included in **Appendix A: Project Approval 08_0022 and Environment Protection Licence 20882**. There were no non compliances identified in relation to the EPL.

The compliance status was assessed by application of the criteria generally in accordance with the Post-approval requirements for State significant developments: Independent Audit Guideline (NSW Government, October 2015) provided in Table 2-3.

The compliance assessment was based on visual observations of the Silverton Wind Farm activities being undertaken on site during site inspections for the IEA, interviews with site personnel and interpretation of the documentation provided by AGL, Jacobs, CATCON, TransGrid and GE. Opinions expressed in the compliance assessment apply to the activities as they existed at the time of the IEA and from information provided by site personnel. Changes to this information of which the auditors are not aware, and have not had the opportunity to assess, have not been considered in the compliance assessment.

Non-compliances with regulatory requirements that occurred during the audit period are summarised in **Section 7.1**.

7.1 Non-Compliances

Where the compliance assessment identified that the intent of specific elements of the regulatory instrument approval had not been met, an assessment of 'non-compliance' has been made. The non-compliances and corresponding recommendations are summarised in **Table 7-1** and detailed in **Appendix A**.

Table 7-1: Non-compliances and Recommendations

CoA	Non-compliances: Condition / Finding / Recommendation
Schedule 2 Condition 18 PA 08_0022 Over All Project	<p>Requirement: Within 6 months of the commencement of construction, the Proponent must prepare a Community Enhancement Program for the project to the satisfaction of the Secretary.</p> <p>Finding: The Community Enhancement Program was developed and is implemented by AGL. The Community Enhancement Program was submitted to the DPE for approval on 3 November 2017 (letter from AGL to DPE sighted). The DPE provided comments by email dated 9 July 2018. Evidence of DPE approval of the Program was not sighted at the time of the audit.</p> <p>2018 IEA OFI 09: Gain formal approval of the Community Enhancement Program from DPE.</p>
Schedule 3 Condition 16 PA 08_0022 Wind Farm	<p>Requirement:</p> <p>(b) ensure all waterway crossings are constructed in accordance with the relevant Water Guidelines for Controlled Activities on Waterfront Land (2012), or their latest version</p> <p>Finding:</p> <p>(b) Waterway crossings were designed by CATCON's civil designer WGA. During the site inspection a culvert was observed not to have been installed on the main access road between the Batch Plant and the Substation. Emails from WGA indicated that the crossing was designed to have a floodway which was yet to be installed at the time of the audit site inspection and a low flow stormwater pipe had been installed to relieve nuisance stormwater flow. Given this it is considered appropriate that an assessment be conducted to ensure that designed controls (culverts and drainage lines) are installed as required by the design and the Guidelines for Controlled Activities on Waterfront Land (2012), across the site. On the basis that no waterway was in place at the time of the inspection at this location, and potentially not at other locations, it was not considered that CATCON was compliant with this condition at the time of the site inspection. However, it was understood that CATCON was progressing construction in a staged way and were intending to become compliant with the condition as construction continued. Given there had been no significant rain during the audit period, no damage or impacts from not installing the waterway crossings was observed.</p> <p>2018 IEA REC 02: Conduct an assessment (or audit) to ensure/confirm that designed controls (culverts and drainage lines) are installed as required by the design and in accordance with the relevant Water Guidelines for Controlled Activities on Waterfront Land (2012), across the site. Install appropriate crossings as required.</p>
Schedule 3 Condition 36 PA 08_0022 Wind Farm	<p>Requirement: (c) Progressive Rehabilitation - employ interim rehabilitation strategies to minimise dust generation, soil erosion and weed incursion on parts of the site that cannot yet be permanently rehabilitated.</p> <p>Finding: Limited interim rehabilitation strategies to minimise soil erosion were sighted. On this basis, this condition has been assessed as non-compliant. Further discussion of rehabilitation performance as observed during the site visit is provided in Table 5-4. Given there had been no significant rain during the audit period, no significant erosion or other impacts from not installing interim rehabilitation strategies was observed. It is understood that since the site visit the project has undertaken further rehabilitation works across the site.</p> <p>2018 IEA REC 07: Employ interim rehabilitation strategies as required of SH3COA36 to minimise soil erosion where permanent controls cannot be immediately completed. Specifically high risk areas e.g. steep cable runs and access roads in steep areas or in Area 7 should be prioritised.</p>
Schedule 4	<p>Requirement: Regular reporting – Report on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs</p>

CoA	Non-compliances: Condition / Finding / Recommendation
Condition 6	approved under the conditions of this approval.
PA 08_0022	<p>Finding: Project and Community updates are provided to the CCC as part of the CCC meeting presentations which are available on the AGL Silverton Wind Farm website. Whilst these updates may at times include discussion of environmental aspects, they are not considered to fulfil the requirement for regular reporting on environmental performance.</p> <p>The Wind Farm Works CEMP commits to reporting regularly to the Principal (AGL) via Weekly Site Progress Reports and Monthly Progress Reports. This includes reporting of issues, incidents, corrective actions relating to heritage and biodiversity matters. The CEMP does not discuss reporting to the public. It is understood that this would be AGL's responsibility.</p> <p>The Connection Works Construction Biodiversity Management Plan states that rehabilitation monitoring will be carried out monthly by the ESR and rehabilitation progress including details of the benchmarks and indicators reported following the monthly inspections. It is unclear who this reporting will be to. It is assumed to be from the ESR to TransGrid. The Plan does not specifically discuss reporting to the public. Again, it is understood that this would be AGL's responsibility.</p> <p>The Overview Environment Strategy prepared by AGL states that the project website will be updated to include regular reporting on environmental performance (as required by this COA) however does not detail what this will cover. Noting there has been environmental and community content included on the website, it does not specifically appear to address the key element of the condition that refers to environmental performance of the project. On this basis it is considered the project are Non-compliant with this condition. It is noted this condition is administrative in nature, and does not impact on the actual environmental performance of the project.</p> <p>2018 IEA REC 10: Provide regular reporting on environmental performance on the AGL Silverton Wind Farm website.</p> <p>2018 IEA REC 11: Update the Overview Environmental Management Strategy to outline the environmental performance reporting which will be provided to the public as per the reporting arrangements in the various plans prepared for the Project.</p>
Wind Farm and	
Connection Works	

7.2 Not Verified Conditions

Where the auditor was not able to collect sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with, or that the condition was unclear in its requirements, the condition was assessed as 'not verified'. The conditions assessed as 'not verified' with corresponding recommendations or opportunities for improvement are summarised in **Table 7-2** and detailed in **Appendix A**.

Table 7-2: Not verified conditions and Recommendations

CoA	Not Verified: Condition / Finding / Recommendation or Opportunity for Improvement
Schedule 3	<p>Requirement: Operating Conditions – Soil and Water (a) minimise any soil erosion associated with the construction and decommissioning of the project by implementing the relevant mitigation measures in Managing Urban Stormwater: Soils and Construction Manual (Landcom 2004), or its latest version</p> <p>Finding: (a) A number of observations were made in respect of erosion and sediment controls as detailed in Section 5.1. Given the issues observed, it was not evident that controls as defined in the Managing Urban Stormwater: Soils and Construction Manual (Landcom 2004) had been installed consistently across the site. It is noted that there has been very limited rain and that controls have not been tested; and significant erosion and sediment deposition was not evident during site inspections. On the basis that significant erosion and sedimentation was not observed, the condition to "minimise any soil erosion" has generally been met, however, potentially only due to a lack of rain. Given the lack of controls, however adherence to "minimise any soil erosion" the compliance status is somewhat up to interpretation, and the</p>
Condition 16	
PA 08_0022	
Over All	
Project	

CoA

Not Verified: Condition / Finding / Recommendation or Opportunity for Improvement

sub-condition was considered to be Not Verified.

2018 IEA REC 01: Install adequate and permanent drainage structures for the access roads across the Wind Farm site to manage erosion and sediment control risks.

It would be expected that this would include: the input of an Erosion and Sediment control expert; a survey across the site to identify all areas of concern and risk rank them according to potential impact; and progressively construct suitable controls across the site. Priority should be given to areas within and surrounding CEECs, such as in Area 7.

2018 IEA OFI 10: Review erosion and sediment controls across the site in coordination with the recommendation to review drainage structures under Schedule 3, Condition 16, PA 08_0022. This should include laydown areas including the crusher pad.

2018 IEA OFI 11: Review drainage along the Connection Works access track and implement controls to ensure drainage is directed off the track to minimise erosion, particularly where there exists long runs on steeper gradients.

Requirement: (f) Enhance the Porcupine Grass Sparse Woodland CEEC on site to ensure there is a net gain in the conservation value of this community.

Finding: One of the biggest threats to the porcupine grass sparse woodland community was reported to be the wild population of goats which feed on the leaves of the Mallee. Goats are used as a commodity by local farmers. A Goat Management Plan has been developed for the Operational Phase to assess impacts and detail controls to assist with this. This was not approved at the time of this audit hence has not been reviewed or considered.

The Biodiversity Management Plan was revised to reflect the additional area of Porcupine Grass to be cleared. The Biodiversity Management Plan reports that careful positioning by design of the access roads, power poles and underground cables has occurred to minimise the impacts on the Porcupine Grass on site. However, the documents do not describe how AGL will “ensure there is a net gain in the conservation value of this community”, as required by the condition. Works on site showed there has been a net loss of area of the Porcupine Grass Sparse Woodland CEEC on site (discussed above). It is not clear how AGL are to meet this condition. Given the construction phase has led to the destruction of some of this community, it is envisaged that the Operational Phase of the Project will have to have in place a plan to address the condition and to “ensure there is a net gain in the conservation value of this community. No operational plan to describe how this was to be completed was sighted by the auditors. The CATCON Biodiversity Management Plan for the construction phase stated “To ensure compliance with condition 18 of schedule 3 of the MOD 3 project approval, a recovery plan for the Porcupine Grass - Red Mallee - Gum Coolibah hummock grassland vegetation community must be prepared in consultation with OEH, the DPI Lands and local leaseholders on site. In December 2017, a draft version of the recovery plan was submitted to the Secretary of the DPE.” This document was not reviewed by the Auditors, and was understood to still be in Draft form at the time of the audit. Given this, auditors were not able to verify compliance with part f) of this condition and the condition is considered “Not Verified”.

2018 IEA OFI 12: AGL to confirm clearing limits through a quality review of data utilised in the development of the Porcupine Grass Sparse Woodland Clearance Register.

2018 IEA REC 03: Finalise and Implement the Porcupine Grass Sparse Woodland Recovery Plan so as to demonstrate the protection and enhancement of the Porcupine Grass Sparse Woodland CEEC on site as required of the condition.

Schedule 3
Condition 17
PA 08_0022
Wind Farm

CoA	Not Verified: Condition / Finding / Recommendation or Opportunity for Improvement
Schedule 3 Condition 18 PA 08_0022 Wind farm	<p>Requirement: Preparation of Biodiversity Management Plan (including Goat Management Plan, Vegetation Management Plan and Porcupine Grass Sparse Woodland CEEC Recovery Plan) prior to commencement of construction.</p> <p>Finding: It is noted that the Porcupine Grass Sparse Woodland Recovery Plan, Vegetation Management Plan and Goat Management Plan were not included in the BMP which was required (as per the condition) prior to construction and that approval for the staged approach to include these plans with the OEMPs was not sought until April 2018 (post construction). However, it is noted that DPE were informed via letter titled 'Pre-Mobilisation Documentation for Approval' dated 27.04.17 that the Recovery Plan for Porcupine Grass Sparse Woodland, Goat Management Plan and Vegetation Management Plan would be prepared prior to the commencement of operations as per the Statement of Commitments. The DPE subsequently approved the BMP (without the required plans) by letter dated 5.05.17. Further, the approved WEMS (SH4COA1) described that various aspects of the plans within the Biodiversity Management Plan would be further developed and issued at a date post commencement of construction (Sections 2.1 to 2.4). On the basis that approval for a staging plan allowing staged submission of the sub plans was not clear prior to construction, and considering DPE approvals of the BMP and the WEMS, compliance with the condition in relation to preparation of the plan is not clear and hence is considered Not Verified.</p>
Schedule 3 Condition 24 PA 08_0022 Wind Farm	<p>Requirement: Prepare and implement a Road Upgrade and Maintenance Strategy (RUMs) in consultation with RMS, DI Lands and Broken Hill City Council to the satisfaction of DPE</p> <p>Finding: It is unclear if the additional conditions set by the DPE in the letter dated 05.05.17 have been actioned. As required by Action 5 in the DPE's letter neither the RUMs or the Traffic Management Plan had been updated to document the outcomes of the abovementioned actions within 40 days of the date of the letter. On the basis that this could not be confirmed this condition has been assessed as not verified.</p> <p>The auditors sighted all required upgrade works during the audit site inspection except upgrades for the access to the Daydream Mine. Feedback from RMS gathered as part of the consultation requirements of this IEA, indicated that at the time of the audit there were still works to be completed as part of the implementation of this Plan at the site access intersection with the Daydream Mine Road.</p> <p>2018 IEA REC 04: Ensure the RUMs has been updated to document the outcomes of the actions identified by the DPE in its approval of the Plan.</p>
Schedule 3 Condition 27 PA 08_0022 Wind Farm	<p>Requirement: TMP – Approval by DPE</p> <p>Finding: It is unclear if the additional conditions set by the DPE in the letter dated 05.05.17 have been actioned. As required by Action 5 in the DPE's letter neither the RUMs or the Traffic Management Plan had been updated to document the outcomes of the abovementioned actions within 40 days of the date of the letter. On the basis that this could not be confirmed this condition has been assessed as not verified.</p> <p>2018 IEA REC 05: Ensure the TMP has been updated to document the outcomes of the actions identified by the DPE in its approval of the Plan.</p>
Schedule 3 Condition 30 PA 08_0022 Overall Project	<p>Requirement: Radio Communications – Baseline assessment</p> <p>Findings: A baseline assessment of radio communication services was completed by Lawrence Derrick & Associates prior to the commencement of construction (report dated 4 May 2017). The report states that the objective of the study was to confirm the clearance requirements for the radio services in the area to allow the wind farm layout to be confirmed or modified so that there will be no detrimental effects on the performance of the existing services. It was not clear that the registered communications licence holders were consulted. The report made a number of recommendations relating to clearances, micro-siting and consultation with operators (Essential Energy, NSW RFS and the NSW Government Telecommunications Authority). It was not clear whether these recommendations had been addressed and on this basis, this condition could not be verified.</p> <p>2018 IEA REC 06: Ensure the recommendations within the baseline assessment of radio communication services are implemented.</p>
Schedule 3	<p>Requirement: (a) Progressive Rehabilitation - rehabilitate all areas of the site not proposed for future disturbance progressively, that is, as soon as reasonably practicable following</p>

CoA	Not Verified: Condition / Finding / Recommendation or Opportunity for Improvement
Condition 36	construction or decommissioning;
PA 08_0022	Finding: Rehabilitation at the Wind Farm had only recently commenced at the time of the audit site inspection and as such limited progressive rehabilitation was visible to the auditors. The timing of rehabilitation was not defined, hence it is not able to be verified if the intent of this condition has been met. Further discussion of rehabilitation performance as observed during the site visit is provided in Table 5-4.
Wind Farm	2018 IEA REC 08: Develop a documented approach with input from suitable experts for the ongoing rehabilitation of the site. This should define rehabilitation criteria over time; what would be done if rehabilitation fails; methods for signing off when rehabilitation has reached agreed rehabilitation criteria; and define progressive rehabilitation approaches. It is noted that the Draft Vegetation Management Plan addresses some aspects of this recommendation.
	2018 IEA REC 09: Large cleared and disturbed areas be provided with improved ERSED controls and rehabilitated progressively. This applies to laydown areas no longer required for construction; and the crusher area. Checks using rock would provide a longer term control and would likely be more effective.
Appendix 3	Requirement: Solar Silverton Program – Commencement of the program
Condition 4	Findings: In accordance with this requirement, AGL has until May 2019 to complete this Program. Whilst the Solar Silverton Program may not have commenced at the onset of construction it was evident that implementation of the program was underway at the time of the audit. As AGL has two years to complete the program, this condition will be better assessed during the next IEA period and as such has been assessed as not verified during this IEA.
PA 08_0022	
Overall	
Project	
Appendix 3	Requirement: Mobile Reception Program – Contribution
Condition 8	Findings: AGL was in the process of consulting with Telstra to implement the Mobile Reception Program, as detailed above for AP3COA7. At the time of the audit AGL was finalising the approval process with the Crown and the Silverton Village Committee in order to progress the program. Quantity of funds could not be confirmed due to the fact that the Program was still in its early stages at the time of the audit.
PA 08_0022	
Overall	
Project	

7.3 Continual Improvement

Conditions that were assessed as compliant and/or where opportunities were identified for continuous improvement are provided in **Table 7-3** and detailed in **Appendix A**.

Table 7-3: Opportunities for Improvement

CoA	Observations and Opportunities for Improvement
Schedule 2	Observation: The auditors sighted Rev 5 of the Final Layout Plan which included the micro-siting of an additional three turbines (from Rev 4). This version was yet to be submitted to the DPE.
Condition 9	
PA 08_0022	2018 IEA OFI 08: Submit the latest Final Layout Plan (Rev 5) to the DPE
Wind Farm	
	Requirement: Preparation of Biodiversity Management Plan (including Goat Management Plan, Vegetation Management Plan and Porcupine Grass Sparse Woodland CEEC Recovery Plan) prior to commencement of construction.
Schedule 3	Findings: See site observations – Section 5.
Condition 18	2018 IEA OFI 13: Ensure that in active construction areas flagging or other suitable delineation is in place to define where CEECs, other sensitive areas and where there is a potential for vehicles to track onto native vegetation.
PA 08_0022	2018 IEA OFI 14: Conduct more seed collection onsite to ensure sufficient seed storage for rehabilitation. Seeds collected from site should be routinely used in rehabilitation where

CoA	Observations and Opportunities for Improvement
	<p>topsoils are not available to spread out over disturbed areas.</p> <p>2018 IEA OFI 15: Update the Connection Works Construction Biodiversity Management Plan for Operations or pull out the requirements relating to post construction rehabilitation, restoration and weed control into an operational document so that they are not overlooked now that construction activities are complete.</p> <p>2018 IEA OFI 16: Implement controls for goats as part of the approved Goat Management Plan.</p>
<p>Schedule 3</p> <p>Condition 21</p> <p>PA 08_0022</p>	<p>Observation: New finds had occurred including four historic and 21 Aboriginal heritage items. These items were identified during a road survey and at the time of the audit had not been included in the HMP. The auditors were informed that these will be included in the revised version of the HMP. It was reported that 15 Aboriginal heritage sites were impacted by the wind farm works and Aboriginal Site Impact Recording Forms completed. A summary of the Aboriginal heritage sites that were impacted was sighted by the auditors as well as examples of completed OEH Aboriginal Site Impacts Recording Forms. Of the 15 sites, it was reported that one site was destroyed (SU76/L1), five sites were partially destroyed (SU2/L3, SU3/L1, SU9/L1, SU10/L1, SU52/L1) and nine sites were not considered a site.</p> <p>2018 IEA OFI 17: Conduct a reconciliation of which aboriginal heritage items were impacted and update the Wind Farm Works HMP to reflect this.</p> <p>2018 IEA OFI 18: Update the Wind Farm Works HMP to include new aboriginal heritage items identified since March 2018 (both maps in Appendix B and list in Appendix C)</p>
<p>Schedule 3</p> <p>Condition 25</p> <p>PA 08_0022</p>	<p>Observation: RMS has identified there are outstanding actions at the site access intersection with Daydream Mine Road under the Road Upgrade and Maintenance Strategy. It is understood that these are ongoing.</p> <p>2018 IEA OFI 19: Continue working with RMS to complete the intersection upgrades at the Daydream Mine Road to the satisfaction of RMS.</p>
<p>Schedule 3</p> <p>Condition 32</p> <p>PA 08_0022</p>	<p>Observation: The Silverton Wind Farm District Pre-Incident Plan prepared by NSW Rural Fire Services is not referenced in the site emergency plan.</p> <p>2018 IEA OFI 20: The site emergency response plan could include reference to the Silverton Wind Farm District Pre-Incident Plan prepared by NSW Rural Fire Services.</p>
<p>Schedule 3</p> <p>Condition 36</p> <p>PA 08_0022</p>	<p>Observation: Weeds are less likely to be identified in current dry conditions, however may be more noticeable following rain.</p> <p>2018 IEA OFI 21: Ensure adequate weed monitoring is conducted after rain events. Suitable controls should be in place to controls weeds identified. It is noted that the Vegetation Management Plan describes an approach to weed management and hence addresses some aspects of this OFI.</p>
<p>Appendix 3</p> <p>Condition A5</p> <p>PA 08_0022</p>	<p>Observation: The Silverton Wind Farm Community Enhancement Program does not appear to discuss how heritage values are taken into account.</p> <p>2018 IEA OFI 22: Update the Silverton Wind Farm Community Enhancement Program to discuss how heritage issues will be taken into account when assessing whether residences are suitable for the installation of solar equipment.</p>

8 Limitations of Report

MCW Environmental Consulting Pty Limited (MCW Environmental) has conducted this Independent Environmental Audit (IEA) and generated this report in accordance with the usual care and thoroughness of the consulting profession for the use of AGL HP1 Limited, AGL HP2 Limited, AGL HP3 Limited and only those third parties who have been authorised in writing by MCW Environmental to rely on this Report.

It is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this Report. This IEA report did not assess any aspects relating to safety at the site.

The IEA Report is prepared in accordance with the scope of work and for the purpose outlined in the MCW Environmental Proposal dated 8 May 2018 and the signed contract executed between MCW Environmental and AGL HP1 Limited, AGL HP2 Limited, and AGL HP3 Limited.

Where this IEA Report indicates that information has been provided to MCW Environmental by third parties, MCW Environmental has made no independent verification of this information except as expressly stated in the Report. MCW Environmental assumes no liability for any inaccuracies in or omissions to that information.

This IEA Report was prepared between 8 June 2018 and 21 December 2018 and is based on the conditions encountered and information reviewed at the time of the site visit on 18 to 19 June 2018. MCW Environmental disclaims responsibility for any changes that may have occurred after this time.

This IEA Report should be read in full. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties. This IEA Report does not purport to give legal advice. Legal advice can only be given by qualified legal practitioners.

Except as required by law, no third party may use or rely on this IEA Report unless otherwise agreed by MCW Environmental in writing. Where such agreement is provided, MCW Environmental will provide a letter of reliance to the agreed third party in the form required by MCW Environmental.

To the extent permitted by law, MCW Environmental expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this IEA Report. MCW Environmental does not admit that any action, liability or claim may exist or be available to any third party.

Except as specifically stated in this section, MCW Environmental does not authorise the use of this IEA Report by any third party.

It is the responsibility of third parties to independently make inquiries or seek advice in relation to their particular requirements and proposed use of the site.

Any estimates of potential costs which have been provided are presented as estimates only as at the date of the IEA Report. Any cost estimates that have been provided may therefore vary from actual costs at the time of expenditure.

Appendix A

Compliance Assessment:

Project Approval 08_0022 & EPL 20882

Silverton IEA Compliance Checklist – Project Approval 08_0022

Reference	Condition	Comments	Audit Finding
OBLIGATIONS TO MINIMISE HARM TO THE ENVIRONMENT			
SH2COA1	In addition to meeting the specific environmental performance criteria established under this approval, the Proponent must implement all reasonable and feasible measures to prevent and / or minimise any material harm to the environment that may result from the construction, operation, or decommissioning of the project.	<p>Wind Farm Works</p> <p>GE-CATCON has developed a number of environmental management plans which outline measures to prevent and / or minimise material harm to the environment from the wind farm works, including:</p> <ul style="list-style-type: none"> • Construction Environmental Management Plan • Emergency Response Management Plan • Pollution Incident Response Management Plan • Biodiversity Management Plan • Heritage Management Plan <p>Implementation of these plans is discussed under the specific conditions relating to the plans. Implementation of the measures was checked during routine inspections including:</p> <ul style="list-style-type: none"> • Monthly environmental inspections by GE-CATCON Environmental Advisor • Bi-monthly environmental inspections by Principal's Engineers Environmental Lead • Weekly inspections by GE-CATCON Health Safety and Environment (HSE) Manager <p>Site reported that there had been no incidents with the potential to cause material harm to the environment during the audit period. The Hazard and Incident Register (SF-12, May 2018) and the Incident Action Register and Tracker (STWF-27, May 2018) were reviewed by the auditors which supported this. The Hazard and Incident Register includes environmental and property damage as well as near misses. Incidents are discussed further in the main section of the report.</p> <p>The site stores minimal quantities of chemicals on site. They were observed to be stored in bunded areas. Fuel was not stored on site in bulk quantities. A local refuelling company was contracted to refuel plant and equipment as required.</p> <p>Connection Works</p> <p>TransGrid developed a number of environmental management plans which outline measures to prevent and / or minimise material harm to the environment from the wind farm works, including:</p> <ul style="list-style-type: none"> • Construction Environmental Management Plan • Environmental Management Strategy • Construction Biodiversity Management Plan • Construction Heritage Management Plan • Soil and Water Management Plan <p>Implementation of these plans is discussed under the specific conditions relating to the plans. Implementation of the measures was checked during routine inspections including:</p> <ul style="list-style-type: none"> • Fortnightly environmental inspections by TransGrid's Environmental Advisor • Bi-monthly environmental inspections by Principal's Engineers Environmental Lead <p>The STWF Connection Works, Environmental Close Out Report (TransGrid, March 2018) reports that there were no instances where environmental harm occurred on the site.</p> <p>A review of the fortnightly environmental inspection reports prepared by TransGrid's Environmental Advisor indicated that environmental issues were being identified and actioned. No significant issues causing material harm to the environment were recorded.</p>	Compliant
TERMS OF APPROVAL			
SH2COA2	The Proponent must carry out the project: (a) generally in accordance with the EA; and (b) in accordance with the conditions of this approval	a) The EA proposed the construction and operation of 172 turbines. The Proponent is constructing 58 of these turbines. Works in Area 7 were put on hold as construction works would not meet the original clearing limit of 0.81 ha of Porcupine Grass Sparse Woodland CEEC provided by the COA. Approval to commence construction in Area 7 was sought from the DPE in consultation with OEH. The DPE approved construction in Area 7 and the clearance of 6.81 hectares of Porcupine Grass Sparse Woodland CEEC subject to a number of conditions by letter dated 22.12.17 (these are discussed further under SH2COA4 below). The internal road network is not exactly as per the EA. During the detailed design phase of the Project, it was determined that some of the roads could not be constructed where they	Compliant

Reference	Condition	Comments	Audit Finding
		<p>were proposed due to the terrain. A number of roads were realigned for constructability reasons and to avoid areas of Porcupine Grass Sparse Woodland CEEC and heritage impacts.</p> <p>The EA included 152 Statement of Commitments (SOCs). The majority of these have been included or superseded by these Conditions of Approval (COA). A number of the SOCs are not applicable as they relate to turbines / areas not constructed. The SOCs which were considered applicable by the Proponent were included in the relevant management plans. The auditors have not undertaken a detailed review or assessment of compliance against each of the SOCs.</p> <p>Implementation of the management plans is assessed against the Condition relating to the specific management plan.</p> <p>Based on the above, it is considered that the Project has been carried out generally in accordance with the EA. Various approvals have been sought and received from the DPE relating to some changes from the EA.</p> <p>b) Refer to remainder of report.</p>	
SH2COA3	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this approval must prevail to the extent of any inconsistency. Note: The general layout of the project is shown in Appendix 2.	The general layout shown in Appendix 2 is for 172 turbines. The Proponent is constructing 58 of these turbines. Final Layout Drawings have been provided to the DPE as required by COA 9.	Noted
SH2COA4	The Proponent must comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of: (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this approval; (b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and (c) the implementation of any actions or measures contained in these documents.	<p>a) As discussed under SH2COA2 above, the DPE approved construction in Area 7 by letter dated 22.12.17 subject to construction activities being undertaken in accordance with the approved Construction Biodiversity Management Plan with the supervision of an ecologist from Biosis and full demarcation of the disturbance footprint. GE-CATCON engaged Biosis to supervise clearing activities in Area 7. Biosis provided GE-CATCON with a letter (dated 4.06.18) which confirmed that clearing activities followed the approved Construction Biodiversity Management Plan with supervision of an ecologist during construction and a full demarcation of the disturbance footprint.</p> <p>Additional requirements associated with the approval of strategies and plans are discussed under the specific condition relating to the plans.</p> <p>b) It was reported that no reviews or audits had been commissioned by the DPE during the audit period.</p> <p>c) Implementation of strategies and plans is discussed under the specific conditions relating to the plans.</p>	Compliant
LIMITS OF APPROVAL			
SH2COA5	Lapse Date: If the Proponent has not physically commenced the project by 24 May 2018, this approval will lapse.	GE-CATCON submitted a revised notification of date of commencement to DPE on 10 May 2017. This letter referred to an earlier notification provided by letter dated 03.04.17. The 10.05.17 letter notified DPE that the pre-construction minor works commenced on the 4 April 2017 and the Construction of wind farm works were to commence 11 May 2017.	Compliant
SH2COA6	Wind Turbines: The Proponent may construct, operate and replace or upgrade as necessary up to 167 wind turbines, but must not construct wind turbines B15, B17 and B21. Notes: • To avoid any doubt, the Proponent does not require additional approval to replace or upgrade wind turbines over time, as long as the replacement or upgrade is carried out in accordance with the conditions of this approval. • To identify the approved turbines, see the figures and corresponding GPS coordinates in Appendix 2.	Amendments to the original windfarm design resulted in a final design of only 58 wind turbines. At the time of the audit site inspection construction was in various stages at all 58 wind turbine locations. Final Layout Plan Rev 05 (CATCON, March 2017) was reviewed by the auditors and does not include reference to B15, B17 or B21 wind turbines. This was confirmed during the audit site inspection.	Compliant
SH2COA7	Wind Turbine Height: No wind turbines may be greater than 180 metres in height (measured from above ground level to the blade tip).	<p>Drawing 444W3224, Rotor Outline Physical Specifications (GE, 20.01.2016) specifies the diameter of the blades as 130m.</p> <p>Drawing 200W4046, Steel Tower, (GE, 11.02.2015) states that the pole height from ground to tower centre is 110m and the distance from the ground to the blade tip in operation is 175m.</p>	Compliant

Reference	Condition	Comments	Audit Finding
SH2COA8	<p>Micro-siting Restrictions: The Proponent may micro-site the wind turbines and ancillary infrastructure without further approval provided:</p> <p>(a) no wind turbine is moved more than 250 metres from the relevant GPS coordinates in Appendix 2;</p> <p>(b) no wind turbine is moved closer to residence VL6 from the relevant GPS coordinates in Appendix 2;</p> <p>(c) the wind turbines and ancillary infrastructure do not result in any additional impacts to biodiversity values including high biodiversity value vegetation and threatened fauna;</p> <p>(d) the wind turbines and ancillary infrastructure do not result in any additional impacts to heritage items; and</p> <p>(e) the revised location of the wind turbine and/or ancillary infrastructure would not result in any non-compliance with the conditions of this approval.</p>	<p>AGL had developed a process for micro-siting which was described to the auditors as follows:</p> <ul style="list-style-type: none"> • GE-CATCON request approval from AGL to micro-site a wind turbine by completing form GF-33 Request for Information. This form includes discussion of how items a)-e) of SH2COA8 will be satisfied. A drawing showing the approved location of the turbine or infrastructure and the requested location is also attached. The drawing is reviewed by CATCON's Environmental Advisor, Ecology and Heritage Partners (EHP) to confirm biodiversity or heritage impacts. The proposed location is also checked by GE to ensure it does no impact on wind modelling. Once all of the above checks have been completed, the form is submitted to AGL. • AGL reviews the request and supporting information and provides a written response objecting or not objecting to the proposed relocation. This is documented within form GF-33. <p>The auditors sighted documentation for the micro-siting of turbine T47, including completed form GF-33 Request for Information, drawing of the proposed turbine relocation and letter from EHP.</p> <p>a) Final Layout Plan Rev 05 (CATCON, March 2017) indicates 13 sites were micro-sited. Micro-siting distances ranged from 13m – 87m from the approved coordinates. By the time of the audit site inspection all turbines had been sited and there was no need for any further micro-siting.</p> <p>b) Final Layout Plan Rev 05 (CATCON, March 2017) and site inspection and interviews conducted by auditors verified that no turbine was moved in south west direction towards VL6.</p> <p>c) As part of the request for a turbine to be micro-sited, CATCON sends the details to its contracted civil designers, WGA. WGA creates a layout plan of the proposed new location of the turbine. The drawings include environmental constraints (e.g. Porcupine Grass Sparse Woodland CEEC, dragon hotspot or heritage items). The drawings include a box which note the micro-siting restrictions provided by this COA and a comment on whether there is any additional impact. Interviews with EHP indicated that in instances where environmental constraints were identified in the vicinity of the turbine, the drawings were reviewed by EHP. A letter was sighted from EHP dated 28.09.17 confirming that EHP had reviewed the drawings and concluded that the micro-siting of turbines 47, 48, 49, 50 and 58 does not result in any additional impacts as referred to in conditions 8(c) and 8(d) of SH2COA8.</p> <p>d) As stated above, in instances where environmental constraints are identified within the vicinity of the proposed turbine location, these are provided to EHP for review. It was reported that there was one instance (T31) where the proposed location may have impacted on a heritage item. In this instance, CATCON consulted with OEH and the DPE and decided to change the design and not micro-site the turbine.</p> <p>e) In its request to AGL for approval of the micro-siting of any turbines, CATCON assesses whether the revised location would result in any non-compliance with the conditions of approval. This request is reviewed by AGL.</p>	Compliant
SH2COA9	<p>Final Layout Plans: Prior to the commencement of construction (apart from upgrades to the public road network and pre-construction minor works), the Proponent must submit detailed plans of the final layout of the project to the Secretary, including:</p> <p>(a) details on the micro-siting of any wind turbines and/or ancillary</p> <p>(b) identification of impacted vegetation communities and threatened fauna locations and habitat;</p> <p>(c) identification of impacted heritage items; and</p> <p>(d) the GPS coordinates of the final wind turbine locations.</p> <p>Should the final layout plans identify any increase in impacts to biodiversity or heritage items than those identified in the EA, the Proponent must seek further approval from the Secretary.</p> <p>Note: If the construction of the project is to be staged, then the provision of these plans may be staged.</p>	<p>Wind Farm Works</p> <p>GE-CATCON submitted a revised notification of date of commencement to DPE on 10 May 2017. This letter notified DPE that the pre-construction minor works commenced 4 April 2017 and the Construction of wind farm works will commence 11 May 2017. Along with this letter, GE-CATCON submitted the Final Layout Plan (Rev 0) which included the turbine coordinates. As clusters of turbines were micro-sited the revised Final Layout Plan was submitted to the DPE. The most recent Final Layout Plan submitted to the DPE was Rev 4 (provided to the DPE by email dated 1.12.17). DPE acknowledged receipt of the revised layout in an email dated 25.01.18. The Final Layout Plan (Rev 4) includes the turbine coordinates, Project approved turbine coordinates and micro sited distance from approved coordinates. The Plan also includes Porcupine Grass Sparse Woodland CEEC mapping, raptor nest locations, Barrier Range Dragon hotspots, potential Barrier Range Dragon habitat, protected heritage items, significant heritage items, new Aboriginal heritage sites, European heritage items and indigenous stone artefacts.</p> <p>The auditors sighted Rev 5 of the Final Layout Plan which included the micro-siting of an additional three turbines (from Rev 4). This version was yet to be submitted to the DPE.</p> <p>Connection Works</p> <p>Letter from TransGrid to DPE dated 24 May 2017 details that final layout plans showing the</p>	<p>Compliant</p> <p>2018 IEA OFI 08 Submit the latest Final Layout Plan (Rev 5) to the DPE</p>

Reference	Condition	Comments	Audit Finding
		transmission line route and structure locations and the Silverton Wind Farm transmission substation locality plan were attached to the letter.	
NOTIFICATION TO DEPARTMENT			
SH2COA10	<p>Prior to the commencement of the construction, operation and/or decommissioning of the project, the Proponent must notify the Department in writing of the date of commencement.</p> <p>If the project is to be staged, then the Proponent must:</p> <p>(a) notify the Department in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the relevant stage; and</p> <p>(b) inform the local community and the Community Consultation Committee about the proposed staging plans.</p>	<p>Wind Farm Works</p> <p>a) The auditors sighted the following evidence to demonstrate compliance with this requirement:</p> <ul style="list-style-type: none"> Letter from GE-CATCON to DPE dated 28.03.17 notifying DPE of intention to commence works on 04 April 2017 (pre-construction minor works) and 01 May 2017 (construction). Letter from GE-CATCON to DPE dated 03.04.17 notifying the DPE of intention to exclude Area 7 from construction works and attaching a Staging Plan. Letter from GE-CATCON to DPE dated 10.05.17 notifying DPE of amendment to construction works start date to 11 May 2017. <p>b) The CCC was notified of the planned commencement of pre-construction minor works at the CCC meeting held on the 30 March 2017. The CCC was given an update at the CCC meeting held on the 25 May 2017 which discussed the commencement of construction works on the 11 May 2017 and what that involved (sighted meeting minutes and presentations dated 30.03.17 and 25.05.17).</p> <p>Connection Works</p> <p>TransGrid informed the DPE (by letter dated 24.05.17) of the intended dates of activities for the transmission line works. This included:</p> <ul style="list-style-type: none"> Mobilisation to Broken Hill substation – 07.06.17 Survey and Pegging of transmission pole locations – 12.06.17 Clearing of transmission line easements commencement – 19.06.17 Commence transmission line pole structure footings – 24.07.17 Silverton Substation bulk earth works (CATCON) – 05.06.17 Mobilise to Silverton Wind Farm Transmission Substation Site – 03.07.17 	Compliant
STRUCTURAL ADEQUACY			
SH2COA11	<p>The Proponent must ensure that:</p> <p>(a) the wind turbines are constructed in accordance with the relevant standards, including the structural design requirements of IEC 61400-1 Wind turbines – Part 1: Design Requirements (or equivalent); and</p> <p>(b) all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p>Notes:</p> <ul style="list-style-type: none"> Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the project. 	<p>Wind Farm Works</p> <p>A Design Certification Letter (LeBLANC, 15.11.17) was sighted certifying that the design of the Silverton Wind Farm is in accordance with normal engineering practice and meets the requirements of the Building Code of Australia (BCA) and Assessment Regulation, relevant Australian Standards and relevant conditions of the Planning Consent.</p> <p>However at the time of the audit, no turbines, buildings or structures associated with the wind farm works had reached practical completion and as such this condition had not been triggered.</p> <p>Connection Works</p> <p>TransGrid reported that all buildings were designed and constructed in accordance with the relevant requirements of the BCA. For the Connection Works this condition is applicable to the Switchroom. It was reported that this building is classified as Class 8, Non-habitable under the BCA. TransGrid provided the auditors with Inspection and Test Plans and Inspection and Test Records relating to the prefabricated switchroom building that were signed as tested / verified by Lai Switchboards. A number of test certificates were provided, including for electrical works, steel products, structural tubing, switchroom sub-frame, air conditioning and fire detection systems. TransGrid also provided a Completion Certificate issued signed by the Principal Certifying Authority dated 14.08.18 certifying that the Auxiliary Services Building is suitable for occupation</p>	Not Triggered (Wind Farm Works) Compliant (Connection Works)

Reference	Condition	Comments	Audit Finding
		and use in accordance with its classification under the BCA.	
DEMOLITION			
SH2COA12	The Proponent must ensure that all demolition work on site is carried out in accordance with AS 2601-2001: The Demolition of Structures, or its latest version.	No demolition works have occurred on site. This condition has not been triggered.	Not Triggered.
PROTECTION OF PUBLIC INFRASTRUCTURE			
SH2COA13	Umberumberka Reservoir and Pipeline: Unless Essential Energy agrees otherwise, the Proponent must ensure the project does not damage the Umberumberka Reservoir or Pipeline.	<p>The Umberumberka Reservoir itself is not in the vicinity of the works, however sections of the Pipeline may be impacted by the construction of access roads.</p> <p>Sections of pipeline under Bypass Road and Daydream Road had additional protection installed over the crossing by GE-CATCON (concrete slab / raft installed over the pipeline). Emails were sighted indicating this solution was acceptable to Essential Water (email from Essential Water to CATCON dated 15.09.17).</p> <p>.GE-CATCON raised concern with Essential Energy about the integrity of the pipeline at the crossing point near the access road between T55 and T56 .GE-CATCON engaged Essential Energy to replace a section of the pipe near the Blue Anchor Tank (Purchase Order for this work sighted).</p> <p>During the site inspection a small section of the pipe near the Blue Anchor Tank was sighted as being intact where it was in shallow ground and adjacent to a meter.</p> <p>TransGrid</p> <p>TransGrid reported that no works were conducted in the vicinity of the reservoir however the 220kV line does cross the pipeline. The pole footings at CN39 are approx. 50 m from the Umberumberka Pipeline. It was reported that there was no impact on the pipeline. TransGrid reported that heavy machinery did not pass over the pipeline as stringing was done via helicopter and the cable puller and tensioners are stationed at structures 34 and 43. It was also reported that no new tracks were constructed in this area.</p>	Compliant
SH2COA14	Umberumberka Reservoir and Pipeline: Prior to carrying out any construction on site (apart from the upgrades to the public road network), the Proponent must carry out a dilapidation survey in consultation with Essential Energy of the relevant parts of the Umberumberka Reservoir and Pipeline within 2 kilometres of the approved development on site.	<p>Wind Farm Works</p> <p>CATCON undertook a dilapidation survey of the relevant parts of the Umberumberka Reservoir and pipeline within 2 km of the approved development site on the 24 March 2017. The survey involved two representatives of Essential Water (a division of Essential Energy) and GE-CATCON personnel.</p> <p>Connection Works</p> <p>NJ Construction prepared a dilapidation report for the 220 kV Transmission Line (report dated 10.08.17). This report did not include the Umberumberka pipeline as it was not considered required by TransGrid as there were no disturbance works in the vicinity of the pipeline.</p>	Compliant
SH2COA15	Repair or Relocation of Public Infrastructure: Unless the Proponent and the applicable authority agree otherwise, the Proponent must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the project; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the project. Note: This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this approval.	<p>Wind Farm Works</p> <p>Other than the works undertaken in conjunction with Essential Energy discussed above, CATCON reported that there had not been any requests by Council or the community to repair any public infrastructure.</p> <p>Connection Works</p> <p>TransGrid reported that public infrastructure was not damaged or relocated as a result of the connection works. Infrastructure protection, such as hurdles, were placed over the existing transmission lines at CN72 to ensure protection during construction (photo dated 10.01.2018 showing hurdles at CN72 over existing transmission lines were viewed by the auditors).</p>	Not Triggered
OPERATION OF PLANT AND EQUIPMENT			

Reference	Condition	Comments	Audit Finding
SH2COA16	The Proponent must ensure that all plant and equipment used on site, or in connection with the project, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	<p>Wind Farm Works</p> <p>CATCON implements the following measures to ensure plant and equipment used on site is maintained and operated in a proper and efficient manner:</p> <ul style="list-style-type: none"> It was reported that CATCON maintains a register of plant, equipment and assets which show plant history, service history and scheduled maintenance. CATCON owned plant undergoes a Plant Risk Assessment (Form SF-27) prior to coming onto site. The Plant Risk Assessment for a 3.5 tonne telehandler was sighted by auditors (dated 18.05.17). The Assessment ticked that the plant had had its three monthly, annual and major 5 yearly inspection. All plant arriving on site was reportedly inspected by a member of the HSE team or a Site Engineer with details recorded on the Plant Inspection Report. The auditors sighted a folder on site with examples of completed Plant Inspection Reports dating back to 15.05.17. The Reports were noted to include checks of noise levels, mechanical checks such as engine exhaust system, visible oil, diesel or hydraulic leaks, air cleaners and air box clean as well as noting the date of the next service. CATCON conducts routine audits / walk arounds of its equipment. The walkaround completed on the 29.03.18 was sighted and noted to checks and include photographs of hydraulic hoses, engine exhaust colour, hydraulic / transmission / engine oil / coolant leaks. Plant operators are required to undergo a Verification of Competency. Examples of completed Verification of Competency forms were sighted by the auditors. <p>Connection Works</p> <p>NJ and CPP maintained a Plant Register on behalf of TransGrid. This was not assessed in detail as all plant and equipment had been demobilised from site at the time of the audit. It is noted that auditors did not check all plant and equipment onsite and the above is a discussion of a sample of information only.</p>	Compliant
UPDATING AND STAGING OF STRATEGIES, PLANS OR PROGRAMS			
SH2COA17	With the approval of the Secretary, the Proponent may submit any strategy, plan or program required by this approval on a progressive basis. To ensure the strategies, plans or programs under the conditions of this approval are updated on a regular basis, the Proponent may at any time submit revised strategies, plans or programs to the Secretary for approval. With agreement of the Secretary, the Proponent may prepare minor revisions to any strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this approval. Notes: • While any strategy, plan or program may be submitted on a progressive basis, the Proponent must ensure that the project being carried out on site is covered by suitable strategies, plans or programs at all times. • If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.	<p>Revisions to management plans have been undertaken on a progressive basis as discussed under the conditions specific to each plan.</p> <p>All management plans assessed as part of this approval were submitted in the requested timeframes and no evidence that the site was not covered by an adequate strategy, plan or program at any time was observed.</p>	Compliant
COMMUNITY ENHANCEMENT			
SH2COA18	Within 6 months of the commencement of construction, the Proponent must prepare a Community Enhancement Program for the project to the satisfaction of the Secretary. This program must: (a) be prepared in consultation with Broken Hill City Council, the Silverton Village Committee and the Community Consultative Committee for the project; (b) establish clear governance arrangements for the Silverton Community Fund; and (c) describe the measures that would be implemented to give effect to the commitments in Appendix 3. Following the Secretary's approval, the Proponent must implement the Community Enhancement Program.	<p>Wind Farm Works</p> <p>The Community Enhancement Program was developed and is implemented by AGL. As per the notification to DPE of intention to commence works letters the commencement of pre-construction works occurred in April 2017 and commencement of construction occurred in May 2017. The program was developed in consultation with the local community, the CCC and Broken Hill City Council. Emails dated 5.10.17 and 12.10.17 showed consultation with the local community, the CCC and Broken Hill City Council regarding the Community Enhancement Program. The Community Enhancement Program was submitted to the DPE for approval on 3 November 2017 (letter from AGL to DPE sighted). The DPE provided comments by email dated 9 July 2018. Evidence of DPE approval of the Program was not sighted at the time of the audit.</p>	<p>Non-compliant</p> <p>2018 IEA OFI 09 Gain formal approval of the Community Enhancement Program from DPE.</p>

Reference	Condition	Comments	Audit Finding
		<p>The Community Enhancement Program describes AGL's commitment to the initiatives outlined in Appendix 3 of the COA including:</p> <ul style="list-style-type: none"> • Silverton Community Fund • Silverton Solar Program • Water Tank Program • Mobile Reception Program <p>Implementation of the Community Enhancement Program is discussed under AP3COA1 to AP3COA8.</p> <p>The condition is somewhat unclear as to whether formal DPE Approval is required, or if it is required to be to "the satisfaction of the Secretary".</p> <p>AGL consider that satisfaction from the Secretary was provided through comments emailed to AGL dated 9 July 2017. These comments comprised required updates and implied no other changes were required. Feedback from DPE Compliance in December 2018 indicated that formal approval from the DPE was required within six months of commencement of construction and has not been provided and therefore the condition should be identified as Non Compliant.</p>	
VISUAL			
SH3COA1	<p>Visual Impact Mitigation: For a period of 3 years from the commencement of construction, the owner(s) of any residence or tourist accommodation facility within 6 kilometres of any wind turbine, may request additional visual mitigation measures at their residence. Upon receiving a written request from these owner(s), the Proponent must implement visual impact mitigation measures (such as landscaping and vegetation screening) at the residence (including its curtilage) in consultation with the landowner. These mitigation measures must be reasonable and feasible, directed towards reducing the visual impacts of the wind turbines on the residence (including its curtilage), and commensurate with the level of visual impact.</p> <p>The mitigation measures must be implemented within 12 months of receiving the written request, unless the Secretary agrees otherwise.</p> <p>If the Proponent and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution. The Secretary's decision on such a referral will be final and binding on both parties.</p> <p>Notes:</p> <ul style="list-style-type: none"> • To avoid any doubt, the visual impact mitigation measures must be aimed at reducing the visibility of the wind turbines from the residence and/or tourist accommodation facility and its curtilage. Mitigation measures are not required to be implemented to reduce the visibility of wind turbines from other locations on the property. • In some cases, mitigation measures may not be warranted as the wind turbines would not be visible from the receiver or its curtilage. • The identification of appropriate visual impact mitigation measures will be easier following the construction of the wind turbines. While owners may ask for the implementation of visual impact mitigation measures shortly after the commencement of construction, they should consider the merits of delaying this request until the wind turbines are visible from their location. 	<p>AGL maintains a spreadsheet which details all residences and properties within a 10km radius of the wind farm. The spreadsheet includes reference to 32 residents.</p> <p>Visual impact mitigation had previously been highlighted at various CCC meetings (e.g. November 2017 CCC Minutes). As of April 2018 AGL had received requests from 5 property owners for visual screening. AGL reported that as at the time of the audit not all towers had been installed, the actual visual impacts for many residents could not be fully understood, and that it was expected that further requests for visual screening may be received.</p> <p>At the time of the audit no planting had been conducted however AGL was in the process of engaging a landscaper who was conducting assessments of visual amenity at each resident's premises where a request had been received by AGL. An email from landscaper 'PotsnPlants' was sighted by the auditors, dated 03.06.18. The email included a trail of correspondence from 23.04.2018 regarding the request for the landscaper to visit properties, provide advice and cost estimates for screening options.</p> <p>AGL reported it will continue to progress requests for additional visual mitigation measures throughout the project.</p>	Compliant
SH3COA2	<p>Visual Impact Mitigation: Prior to the commencement of construction, the Proponent must notify the relevant owners of the residences or tourist accommodation facility referred to in condition 1 above, that they have the right to request the Proponent to implement visual impact mitigation measures at their residence (including its curtilage) at any time within 3 years of the commencement of construction.</p>	<p>CCC meeting minutes (November 2017) addresses visual impact mitigations and notifies residences of the mitigation measures to be implemented. CCC meeting minutes are publically available on the AGL website. In addition AGL sent an email on 28 April 2017, as detailed in the AGL consultation record, notifying the relevant landowners of the visual impact mitigation measures to be implemented.</p>	Compliant
SH3COA3	<p>Visual Appearance: The Proponent must:</p> <p>(a) minimise the off-site visual impacts of the project;</p> <p>(b) ensure the wind turbines are:</p> <ul style="list-style-type: none"> • painted off white/grey; and • finished with a surface treatment that minimises the potential for glare and reflection; <p>(c) ensure the visual appearance of all ancillary infrastructure (including paint colours, specifications and screening) blends in as far as possible with the surrounding landscape; and</p>	<p>Wind Farm Works</p> <p>The O&M building is completely screened and not visible from any residents. The turbines were observed to be painted off white and had a matte finish to minimise glare. No advertising signs or logos were observed on the wind turbines.</p> <p>The June 2017 CCC Meeting reported that AGL has engaged a local landscaper who has been meeting with local landowners to discuss visual mitigations (refer SH3COA1 above).</p>	Compliant

Reference	Condition	Comments	Audit Finding
	(d) not mount any advertising signs or logos on wind turbines or ancillary infrastructure.	<p>Connection Works</p> <p>The transmission line works are visible from Silverton Road and the Barrier Highway, including pole structures, conductors and access tracks.</p> <p>The Substation works at Broken Hill and Silverton were constructed to be visually consistent with the surrounding infrastructure. Works at Silverton included a single building of surmised colorbond (photo dated 9.11.17 showing building sighted). No advertising signs or logos were observed on the transmission poles.</p>	
SH3COA4	<p>Lighting: The Proponent must:</p> <p>(a) minimise the off-site lighting impacts of the project;</p> <p>(b) ensure that all external lighting associated with the project:</p> <ul style="list-style-type: none"> • is installed as low intensity lighting (except where required for safety or emergency purposes); • does not shine above the horizontal; • uses best management practice for bat deterrence; and • complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version. 	<p>Wind Farm Works</p> <p><u>Construction</u></p> <p>The nearest off-site receiver is approximately 6km away as a result of this and the general location and remote nature of the site there is very little light spill impact off-site as a result of night works during construction.</p> <p><u>Operations</u></p> <p>There is no lighting on the wind turbines as lighting was not a requirement by CASA due to the location of the wind farm.</p> <p>The O&M building will have permanent lighting however this building is not visible off-site.</p> <p>An obtrusive light report for the GE-CATCON substation was completed by CPP – Silverton Wind Farm 33kV Switchyard Obtrusive Light Report (16.10.17). The report states that residents will not be affected by lighting of the Silverton Wind Farm due to screening effects of the surrounding topography. The report also states that no effect on road users is anticipated with the exception of the light from the switchyard which can be seen from certain parts of Wilangee Road. The impact was minimised by tilting the lights installed. The distance between the road and light source minimises the impact.</p> <p>Connection Works</p> <p>TransGrid reported that works were not conducted at night during construction of the connection works. Permanent low intensity lighting was installed at Silverton Substation which was installed in accordance with TransGrid's corporate standard STD-140324_01_DOC (July 2010) which details requirements to implement best practice lighting. The connection works were visited prior to sunrise and no light spill issues were observed.</p>	Compliant
SH3COA5	Shadow Flicker: The Proponent must ensure that shadow flicker from operational wind turbines does not exceed 30 hours per annum at any non-associated residence.	<p>As the wind farm was not operational at the time of the audit this condition was not triggered.</p> <p>No shadow flicker was considered likely at any associated residence at the time of the site inspection from turbines that were under commissioning.</p>	Not triggered
NOISE			
SH3COA6	<p>Construction and Decommissioning Noise: The Proponent must:</p> <p>(a) minimise the noise generated by the construction or decommissioning of the project, including any associated traffic noise; and</p> <p>(b) ensure the noise generated by any construction or decommissioning activities is managed in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version.</p>	<p>Wind Farm Works</p> <p>Resonate Acoustics was contracted by GE-CATCON to undertake a construction noise assessment at Silverton Wind Farm (Report Dates 7.09.17, Reference S17679RP1). Monitoring was conducted in August 2017 at multiple locations and under a number of scenario conditions including noise from construction activities outside of standard hours.</p> <p>Resonate Acoustics considered that an external construction noise level of 10 dB(A) or less would be inaudible within residences at all times based on the background noise levels. However the Interim Construction Noise Guidelines provides an alternative criterion of 35 dB(A) for works outside standard hours which is considered appropriate subject to there being strong justification for the works and approval being received from the Secretary.</p> <p>The monitoring assessment predicted that noise levels from the various scenarios at the nearest residence would be audible but <i>significantly less than the 35 dB(A) noise management level</i>.</p> <p>As part of its assessment Resonate Acoustics developed a tool (noise calculator) to enable GE-CATCON to evaluate noise levels resulting from each stage of works. The calculator allows CATCON to predict the noise level (and whether it will be audible) at each of the identified receivers based on the type, number and location of plant / equipment to be used and the prevailing weather conditions at the time. GE-CATCON used the calculator to conduct routine noise assessments. It was reported that the 35dB(A) noise management level had not been exceeded during the audit period. The noise calculator was observed by the auditors for a</p>	Compliant

Reference	Condition	Comments	Audit Finding																																																	
		<p>scenario involving construction activities at T11 on the 28 August 2017.</p> <p>In addition to the above the following is also noted with regards to noise generated by the project:</p> <ul style="list-style-type: none">AGL utilise the CCC meetings to provide residents with an update on noise impacts.Plant and equipment is maintained in accordance with OEM specifications.No community complaints have been received relating to noise. <p>Connection Works</p> <p>TransGrid contracted NGH Environmental to conduct a noise assessment of works to be conducted outside of approved working hours. This assessment was conducted prior to works being undertaken to ensure compliance with project approval conditions. The report, dated 31.08.17, concludes that the extension of working hours is considered consistent with Project Approval conditions. Furthermore, NGH reported that <i>Noise levels would generally be inaudible with the exception of the worst case scenario that will still be classed as very quiet at Acacia Vale.</i> TransGrid did not report any complaints with regards to noise being received during connection works.</p>																																																		
SH3COA7	<p>Construction and Decommissioning Noise: Unless the Secretary agrees otherwise, the Proponent must only undertake construction or decommissioning activities between:</p> <p>(a) 7 am to 6 pm Monday to Friday;</p> <p>(b) 8 am to 1 pm Saturdays; and</p> <p>(c) at no time on Sundays and NSW public holidays.</p> <p>The following construction or decommissioning activities may be undertaken outside these hours without the approval of the Secretary:</p> <ul style="list-style-type: none">activities that are inaudible at non-associated residences;the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; oremergency work to avoid the loss of life, property and/or material harm to the environment	<p>Wind Farm Works</p> <p>A number of construction activities were undertaken outside of these times, mostly relating to concrete pours and associated batching. GE-CATCON liaised directly with the EPA to notify work planned to be conducted outside of the prescribed hours. Emails sent to the EPA on 8 September 2017 and 19 June 2018 were sighted by the auditors. The EPA requested that it be notified if any noise complaints associated with the works were received. This was not triggered as no complaints were recorded for any of the out of hours works undertaken.</p> <p>Work conducted outside of prescribed hours was inaudible at non-associated residences (as determined using the noise calculator tool developed by Resonate Acoustics) and as such approval from DPE was not required.</p> <p>Connection Works</p> <p>TransGrid conducted some works outside of the specified timeframes. Prior to work commencing outside of specified hours an assessment was conducted to ensure compliance with project approval conditions. Refer evidence against SH3COA6.</p>	Compliant																																																	
SH3COA8	<p>Operational noise criteria – Wind Turbines: The Proponent must ensure that the noise generated by the operation of wind turbines does not exceed the relevant criteria in Table 1 at any non Associated resident.</p> <p><i>Table 1: Noise criteria dB(A)</i></p> <table><tr><th rowspan="2">Residence Id</th><th colspan="9">Criteria (dB(A)) with Reference to Hub Height Wind Speed (m/s)</th></tr><tr><th>4</th><th>5</th><th>6</th><th>7</th><th>8</th><th>9</th><th>10</th><th>11</th><th>12</th></tr><tr><td>VL9, 10, 11, 12, 14, 15, 16, 17a, 17b, 18, 19, 20, 21, 22, 24a, 24b, 25a, 25b, 28a, 28b, 29</td><td>35</td><td>35</td><td>35</td><td>35</td><td>35</td><td>35</td><td>35</td><td>36</td><td>38</td></tr><tr><td>VL6</td><td>38</td><td>39</td><td>40</td><td>40</td><td>41</td><td>42</td><td>43</td><td>45</td><td>46</td></tr><tr><td>All other privately owned non-associated residences</td><td colspan="9">The higher of 35 dB(A), or the existing background noise level LA90 (10-minute) plus 5 dB(A).</td></tr></table> <p><i>Note: To interpret the land referred to in Table 1, see the applicable figures in Appendix 2.</i></p>	Residence Id	Criteria (dB(A)) with Reference to Hub Height Wind Speed (m/s)									4	5	6	7	8	9	10	11	12	VL9, 10, 11, 12, 14, 15, 16, 17a, 17b, 18, 19, 20, 21, 22, 24a, 24b, 25a, 25b, 28a, 28b, 29	35	35	35	35	35	35	35	36	38	VL6	38	39	40	40	41	42	43	45	46	All other privately owned non-associated residences	The higher of 35 dB(A), or the existing background noise level LA90 (10-minute) plus 5 dB(A).									<p>The Wind Farm had not commenced operations at the time of the audit.</p>	Not Triggered
Residence Id	Criteria (dB(A)) with Reference to Hub Height Wind Speed (m/s)																																																			
	4	5	6	7	8	9	10	11	12																																											
VL9, 10, 11, 12, 14, 15, 16, 17a, 17b, 18, 19, 20, 21, 22, 24a, 24b, 25a, 25b, 28a, 28b, 29	35	35	35	35	35	35	35	36	38																																											
VL6	38	39	40	40	41	42	43	45	46																																											
All other privately owned non-associated residences	The higher of 35 dB(A), or the existing background noise level LA90 (10-minute) plus 5 dB(A).																																																			
	Noise generated by the operation of the wind turbines is to be measured in accordance with the relevant requirements of the South Australian Environment Protection Authority’s Wind Farms – Environmental Noise Guidelines 2009 (or its latest version), as modified by the provisions in Appendix 4. If this guideline is replaced by an equivalent NSW guideline, then the noise generated is to be measured in accordance with the requirements in the NSW guideline.	Site had not commenced operations at the time of the audit.	Not Triggered																																																	

Reference	Condition	Comments	Audit Finding											
SH3COA9	Operational Noise Criteria – Ancillary Infrastructure: The Proponent must ensure that the noise generated by the operation of ancillary infrastructure does not exceed 35 dB(A) LAeq(15 minute) at any non-associated residence. Noise generated by the operation of ancillary infrastructure is to be measured in accordance with the relevant requirements of the NSW Industrial Noise Policy (or its equivalent) as modified by the provisions in Appendix 4.	Site had not commenced operations at the time of the audit.	Not Triggered											
SH3COA10	Operational Noise Monitoring: Within 6 months of the commencement of operations, the Proponent must: (a) undertake noise monitoring to determine whether the project is complying with the relevant conditions of this approval; and (b) submit a copy of the monitoring results to the Department and the EPA. The Proponent must undertake further noise monitoring of the project if required by the Secretary.	Site had not commenced operations at the time of the audit.	Not Triggered											
BLASTING														
SH3COA11	Blasting Hours: The Proponent may only carry out blasting on site between 9 am and 5 pm Monday to Saturday. No blasting is allowed on Sundays or public holidays.	<p>Wind Farm Works</p> <p>For each blast undertaken as part of the wind farm works, the drilling contractor, A&M Drilling, prepared a Blast Report which included the date and time of blast as well as the blasting specifications. These were collated by CATCON into a spreadsheet 'Blast Monitoring Records'. A total of 57 Blasts were recorded. The auditor spot checked the date and time of a number of blasts in the spreadsheet against the Blast Reports prepared by A&M Drilling. In all 8 instances reviewed, the numbers in the spreadsheet correlated with those in the Blast Reports. A review of the spreadsheet indicated that all of the blasts were undertaken between 9 am and 5pm Monday to Saturday.</p> <p>Connection Works</p> <p>Blasting relating to the connection works was undertaken on Wednesday 1 November 2017 at five locations. The Blast Reports prepared by Tablelands Explosives indicated that blasts occurred between 11:58 am and 4:36 pm.</p>	Compliant											
SH3COA12	<p>Blasting Criteria: The Proponent must ensure that any blasting carried out on site does not result in any exceedances of the criteria in Table 2.</p> <p><i>Table 2: Blasting criteria</i></p> <table> <tr> <th>Location</th><th>Airblast overpressure (dB(Lin Peak))</th><th>Ground vibration (mm/s)</th><th>Allowable exceedance</th></tr> <tr> <td rowspan="2">Any non-associated residence</td><td>120</td><td>10</td><td>0%</td></tr> <tr> <td>115</td><td>5</td><td>5% of the total number of blasts or events over a period of 12 months</td></tr> </table>	Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance	Any non-associated residence	120	10	0%	115	5	5% of the total number of blasts or events over a period of 12 months	<p>Wind Farm Works</p> <p>Event Reports which included the pressure and ground vibration measured at the blast site were available for just under half of the blasts. A formula was applied by CATCON (as advised by Resonate Acoustics) to convert the pressure recordings (pascals) into sound pressure levels (dBL). After applying this calculation, two of the blasts recorded airblast overpressure levels greater than 120 dB(L) as measured at the blast location. An email from Resonate Acoustics (31.08.17) indicated that the actual overpressure at the nearest residence would be approximately 17dB lower than that measured at the monitor when adjusted for the attenuation of the overpressure over distance. CATCON applied the attenuation adjustment to all of the airblast overpressure results and none of the adjusted results exceeded the criteria when applying this attenuation approach.</p> <p>The ground vibration results reviewed were below the criteria.</p> <p>Whilst it is recognised that blast monitoring was not available for all blasts, based on the results available indicating that the criteria was easily met (when adjusted for sound pressure attenuation to the nearest non-associated residence) and that no complaints were received, this condition is considered compliant.</p> <p>Connection Works</p> <p>The Blast Reports prepared by Tablelands Explosives include monitoring results for airblast overpressure and ground vibration. A review of the Blast Reports for the five blasts on the 1 November 2017 indicated no exceedances of either the airblast overpressure or the ground vibration criteria.</p>	Compliant
Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance											
Any non-associated residence	120	10	0%											
	115	5	5% of the total number of blasts or events over a period of 12 months											
AIR														
SH3COA13	The Proponent must minimise the: (a) dust and blast fume emissions of the project; and (b) surface disturbance of the site.	<p>Wind Farm Works</p> <p>a) The auditors note that the site is located in a region that experiences prolonged periods without</p>	Compliant											

Reference	Condition	Comments	Audit Finding
		<p>rain. As such, the area is commonly regarded as a dusty environment. Water use for dust suppression is utilised on an as needs basis due to the need to conserve water in drought like conditions.</p> <p>Monthly environmental inspections conducted by EHP considers dust. For example, report for March 2018 identifies issue of dust from stockpiles in Area 7 and recommends additional wetting down. The April 2018 report identifies excessive dust at the site entrance and recommends additional wetting down.</p> <p>CATCON also conduct weekly inspections of the site and tracks actions in the CATCON HSE Improvement Register. Excessive dust was identified being generated on four occasions during CATCONs inspections conducted on the 17.07.17, 22.09.17, 04.10.17 and 06.04.18. These actions were all closed out at the time of the audit and included ongoing monitoring of dust levels around the site.</p> <p>During a CCC Meeting a residence highlighted dust on the short Broken Hill bypass road. Water carts are used in the morning before shift times and in the afternoon prior to shifts concluding as a mitigation to prevent dust. This was observed during the site inspection on 19 June 2018.</p> <p>Controls include:</p> <ul style="list-style-type: none"> • Sprinklers at batch plant (not sighted as decommissioned at time of audit inspection); • Water carts on road surfaces (two on site during audit inspection) • Site activities were modified on high wind day's e.g. mobile crusher was stopped for short periods on occasion (noted in inspection reports). • Speed limit of 40km on site. On windy days, speed limit reduced to 20 km (broadcast on radio). <p>No complaints had been received with regards to air quality. In addition blasting fumes were minimal due to small charge and confined blasts.</p> <p>During the site inspection dusty conditions were encountered, noting the dry conditions. The dust was mainly observed from passing vehicles and winds were very light during the inspections. In non-drought conditions and an abundance of water supply, it would be expected that more frequent use of the water cart would occur. However, given the dire scarcity of water in the region at the time of the inspection, a pragmatic approach to this condition has been taken, and it is considered that dust mitigation is at a sensible level. On this basis CATCON are considered generally compliant with this condition.</p> <p>b) During site inspections a number of cleared areas outside of the permanent footprint of the access roads, towers and site infrastructure were noted. Cable runs were reported as being required to be placed separate to roads to allow for the construction sequence and were to be rehabilitated. Numerous laydown areas were used for equipment and material storage and stockpile areas. CATCON reported that generally efforts were made to limit the footprint of access roads to reduce site disturbance. Some minor areas were observed where plant had appeared to go outside of areas required. Rehabilitation of these areas will be required. Generally, it is considered CATCONs works were aimed at minimising the area of disturbance within the above and general construction constraints.</p> <p><u>Connection Works</u></p> <p>a) No complaints for dust or blast fumes recorded during connection works. Urban Perspectives conducted fortnightly inspections of the site which included an assessment of dust emissions from connection works. Findings relating to dust exceedances were identified by the inspector, however these were addressed upon identification, as reported in inspection reports viewed by the auditors.</p> <p>b) For the areas observed during the site inspection, surface disturbance appeared to be limited to the access tracks and areas adjacent to the tracks for construction activities including cable installation. Based on site observations, the area of disturbance appeared to be minimised.</p>	
SOIL & WATER			
SH3COA14	<p>Water Supply: The Proponent must ensure that it has sufficient water for all stages of the project, and if necessary, adjust the scale of its activities on site to match its available water supply.</p> <p>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Proponent is required to obtain the necessary water licences for the project.</p>	<p><u>Wind Farm Works</u></p> <p>No water licences or approvals are required for construction or operation of the Wind Farm Works. The site sought a water allocation of approximately 100 ML from Essential Water via email dated 1.11.16. The email outlined that the water would be used for road and crane hardstand construction, concrete manufacture and dust suppression and miscellaneous activities and provided an estimate of water requirements for each activity. The email anticipated that the water</p>	Compliant

Reference	Condition	Comments	Audit Finding
		<p>would be required over a 15 month period from February 2017 to April 2018.</p> <p>Essential Water confirmed that 100ML of water from the Umberumberka Reservoir would be available for the project via email dated 14.11.17. Site had installed a water meter to monitor water usage for the project. As of June 2018 the site had used 80.343 ML. AGL reported that it intends to request an extension of the water usage dates from Essential Energy. On this basis, no specific action has been raised in this report.</p> <p>Connection Works</p> <p>TransGrid procured a local water supply for dust suppression, with a limit of 1 tanker per day applied. TransGrid reported that water use was balanced between the amount of available water supply and the severity of the dust events in consultation with Broken Hill Shire Council and DECCW Guidelines.</p>	
SH3COA15	<p>Water Pollution: Unless an EPL authorises otherwise, the Proponent must comply with section 120 of the Protection of the Environment Operations Act 1997.</p> <p>Note: Section 120 of the POEO Act makes it an offence to pollute any waters.</p>	<p>Wind Farm Works</p> <p>The site does not have authorised discharge points specified in its Environmental Protection Licence (EPL 20882).</p> <p>As part of weekly, monthly and bi-monthly inspections water pollution and water quality is generally inspected and reported on. Inspection results indicate that there have been no environmental incidents at the site which would have caused pollution to waterways.</p> <p>All creeks were dry during the site inspection. No incidents were recorded relating to water pollution</p> <p>Connection Works</p> <p>A Soil and Water Management Plan was developed by NGH environmental (May 2017). The Connection Works Environmental Site Representative (ESR) conducted fortnightly inspections of the site which included an assessment of water pollution from connection works. Review of inspection reports indicated that no instances of water pollution were recorded.</p> <p>Photo dated 10.10.17 shows sediment fencing in place at Silverton Substation.</p>	Compliant
SH3COA16	<p>Operating Conditions: The Proponent must:</p> <p>(a) minimise any soil erosion associated with the construction and decommissioning of the project by implementing the relevant mitigation measures in Managing Urban Stormwater: Soils and Construction Manual (Landcom 2004), or its latest version;</p> <p>(b) ensure all waterway crossings are constructed in accordance with the relevant Water Guidelines for Controlled Activities on Waterfront Land (2012), or their latest version;</p> <p>(c) store and handle all dangerous goods or hazardous materials on site, and ensure the concrete batching plants and substations on site are bunded, in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids, or its latest version; and</p> <p>(d) minimise any hydrocarbon spills on site, and clean up any spills as soon as possible after they occur.</p>	<p>Wind Farm Works</p> <p>a) Erosion and Sediment Control Plans (ESCP) have been prepared for each layout plan for construction issue drawings by the GE-CATCON site engineers. ESCPs are reviewed by EHP monthly and verify if the document has been reviewed and if it reflects what is occurring on site.</p> <p>GE CATCON reported that <i>“Erosion and Sediment Control Plans (ESCPs) have been prepared and continually revised (several revisions for each area of works) since the commencement of construction. Separate ESCPs have been for the road/hardstand works and for the underground cable/OHP pole works. As a general rule, all ESCPs are prepared by a qualified civil engineer from the site works team. As part of the works strategy to manage erosion risks, a quantity of sand bags is always available on site for immediate deployment to any affected area. The effectiveness of the installed erosion and sediment controls is monitored daily by site EHS advisors and any rectification requirements are recorded as part of the weekly site check.”</i></p> <p>ESCP (Rev a, June 2018) was reviewed by the auditors.</p> <p>During site inspections a number of observations were made in respect of erosion and sediment controls. These are detailed in Section 5.1 of the main IEA Report. Example of issues included:</p> <ul style="list-style-type: none"> In many areas permanent drainage controls to manage long term erosion and sedimentation risks related to the access roads did not appear to have been fully installed e.g. stabilised drains; rock checks in drains; redirection of water off roads; batter chutes; etc. In areas further developed (such as the northern section of Area 6), some structures including batter protection was observed; Numerous cable runs were observed on steep ground with a high potential for wash out or erosion issues in the event of rain. There were limited erosion and sediment controls installed as temporary measures 	<p>Not verified (a) Non Compliant (b)</p> <p>Refer to SH3COA36 and Section 5.1 of the main IEA report for detailed observations and recommendations.</p> <p>2018 IEA REC 01</p> <p>Install adequate and permanent drainage structures for the access roads across the Wind farm site to manage erosion and sediment control risks.</p> <p>It would be expected that this would include: the input of an Erosion and Sediment control expert; a survey across the site to identify all areas of concern and risk rank them according to potential impact; and progressively construct suitable controls</p>

Reference	Condition	Comments	Audit Finding
		<p>prior to rehabilitation;</p> <ul style="list-style-type: none"> Large cleared and disturbed areas such as the crusher pad and laydown areas did not appear to have effective erosion and sediment controls. Some sediment fences were observed, however were in places not well installed (not dug in); were in the wrong places, or had deteriorated in the sun. <p>CATCON reported that the approach would be to install controls in the event that rain was forecast. This may be sufficient for small areas, however with the extent of open works observed it is not considered feasible to address the risks in such a short timeframe. It is acknowledged that as further areas are rehabilitated, the extent of the issue will diminish, as long as slope stabilisation and suitable drainage is installed as part of the rehabilitation effort.</p> <p>Given the issues observed, it was not evident that controls as defined in the Managing Urban Stormwater: Soils and Construction Manual (Landcom 2004) had been installed consistently across the site. It is noted that there has been very limited rain and that controls have not been tested; and significant erosion and sediment deposition was not evident. On the basis that significant erosion and sedimentation was not observed, the condition to “minimise any soil erosion” has generally been met, however, potentially only due to a lack of rain. Given the lack of controls, however adherence to “minimise any soil erosion” the compliance status is somewhat up to interpretation, the sub-condition was considered to be Not Verified.</p> <p>b) Waterway crossings were designed by CATCON's civil designer WGA. WGA in its letter titled Certificate of Design – Area 2 Civil Design (WGA, 17.05.2017) certifies that the Area 2 Civil Design was designed in accordance with NSW Department of Primary Industries Office of Water – Guidelines for instream works on waterfront land (Controlled Activities on Water Front Land).</p> <p>During the site inspection a culvert was observed not to have been installed on the main access road between the Batch Plant and the Substation. Emails from WGA indicated that a culvert was to go into at this location and noted “<i>Access road runs along water course and is only 0.3m above natural level– potential for significant scouring and flooding of the access road.</i>” WGA indicated that the crossing was designed to have a floodway which was yet to be installed at the time of the audit site inspection and a low flow stormwater pipe had been installed to relieve nuisance stormwater flow (email from WGA to CATCON dated 2.07.17) Given this, it is considered appropriate that an assessment be conducted to ensure that designed controls (culverts and drainage lines) are installed as required by the design and the Guidelines for Controlled Activities on Waterfront Land (2012), across the site. On the basis that no waterway was in place at the time of the inspection at this location, and potentially not at other locations, it was considered that CATCON was non-compliant with this condition at the time of the site inspection. However, it was understood that CATCON was progressing construction in a staged way and were intending to become compliant with the condition as construction continued.</p> <p>c) The temporary concrete batching plant was decommissioned at the time of the audit site inspection. It was reported that the batch plant equipment and stored chemicals were banded during operation. The transformer located within the substation was banded. Whilst this wasn't inspected during the audit, the transformer design drawing 9223470702 (Schneider Electric, 07.08.2017) details the oil bund which surrounds the transformer. No issues with regards to the management of dangerous goods or hazardous materials were observed during site inspections.</p> <p>d) Environmental inspection reports undertaken by CATCON's Environmental Lead and the Principal Engineer's Environmental Lead show hydrocarbon spills have previously been identified and rectified. The auditors observed spill kits on site, including at the compound, and as wheelie bin spill kit at the crane site. In addition it was reported that some equipment (e.g. cranes) and light vehicles have spill kits. No hydrocarbon spills were observed on site during site inspections.</p> <p>Table 5-4 of the Main Report describes observations and findings made in relation to erosion and sedimentation management.</p> <p>Connection Works</p>	<p>across the site. Priority should be given to areas within and surrounding CEECs, such as in Area 7.</p> <p>2018 IEA REC 02 Conduct an assessment (or audit) to ensure/confirm that designed controls (culverts and drainage lines) are installed as required by the design and in accordance with the relevant Water Guidelines for Controlled Activities on Waterfront Land (2012), across the site. Install appropriate crossings as required.</p> <p>2018 IEA OFI 10 Review erosion and sediment controls across the site in coordination with the recommendation to review drainage structures under Schedule 3, Condition 16, PA 08_0022.</p> <p>2018 IEA OFI 11 Review drainage along the Connection Works access track and implement controls to ensure drainage is directed off the track to minimise erosion, particularly where there exists long runs on steeper gradients.</p>

Reference	Condition	Comments	Audit Finding
		<p>a) Given the timing of the audit post construction works, the construction phase was not assessed in this audit. However, some areas of the access track were observed to have long runs with the potential for erosion to occur in the event of rain. This is discussed in Section 5 of the main report with associated recommendations.</p> <p>b) All watercourses associated with the connection works were ephemeral and intermittent. TransGrid report that at the time of connection works occurring all water courses were dry with a high level of sediment and bare eroding banks. No works were conducted at the crossing of Acacia Creek and Umberumberka Creek. Photo of CN41 dated 25.10.17 shows crossing near structure 41 (unnamed ephemeral water course) which had some rock material imported to provide a solid crossing. The site had since been reinstated back to near original levels. The auditors were unable to verify if the waterway crossing was constructed in accordance with the requirements of Condition 16(b), Schedule 2.</p> <p>c) & d) Urban Perspectives conducted fortnightly inspections of the site which included an assessment of chemical storage on site. Inspections identified two oil spills which required mitigation measures to be implemented i.e. soil removal and disposal.</p> <p>Table 5-4 of the Main Report describes observations and findings made in relation to erosion and sedimentation management. In relation to the Connection Works it was observed that the access track in some places is directed down slope with limited or no proactive drainage measures installed to direct water off the road. There is therefore a potential for runoff water to concentrate down the track and cause erosion/scouring of the track with associated sediment deposition in these areas.</p>	
BIODIVERSITY			
SH3COA17	<p>Operating Conditions: The Proponent must:</p> <p>(a) ensure that no more than</p> <ul style="list-style-type: none"> • 0.81 hectares of Porcupine Grass Sparse Woodland CEEC; and • 0.54 hectares of the Mulga/Red Mallee Shrubland and Chenopod – Red Mallee Woodland/Shrubland; is cleared for the project, unless the Secretary agrees otherwise; <p>(b) ensure wind turbines are located as far as possible, but at least 200 metres, from raptor nests unless the Secretary agrees otherwise;</p> <p>(c) ensure no development occurs in mapped Barrier Range Dragon habitat hotspots (see figure in Appendix 5);</p> <p>(d) locate wind turbines as far as practicable away from treed vegetation, rocky outcrops, caves or disused mine shafts/sites;</p> <p>(e) minimise:</p> <ul style="list-style-type: none"> • impacts on the Barrier Range Dragon; • impacts on threatened bird and bat populations; • the clearing of native woodland vegetation and fauna habitat, in particular spinifex habitat, standing dead trees and woody habitat and high biodiversity value vegetation communities; and <p>(f) enhance the Porcupine Grass Sparse Woodland CEEC on site (see figure in Appendix 5) to ensure there is a net gain in the conservation value of this community.</p>	<p>Wind Farm Works</p> <p>a) The area in this condition was amended from 0.82ha to 6.81ha in consultation with OEH and DPE. DPE approval to commence construction in Area 7 and clear 6.81 ha of Porcupine Grass Sparse Woodland CEEC was provided by letter dated 22.12.17. The letter noted that construction activities in Area 7 must be undertaken in accordance with the approved Biodiversity Management Plan with supervision of an ecologist from Biosis and full demarcation of the disturbance footprint. CATCON was tracking the amount of Porcupine Grass Sparse Woodland CEEC cleared via a Porcupine Grass Sparse Woodland Clearance Register. The register included an important note that “no more than 6.81 ha of Porcupine Grass Sparse Woodland is cleared for the project”. The register listed the Ground Disturbance Permit (GDP) number, amount cleared, accumulative total and allowable clearing remaining as well as comments. It was reported during the site inspection that the hectares of Woodland cleared relating to each GDP was determined by Biosis. As per the DPE approval of the works in Area 7 (22.12.17), Biosis reported that they were on site during all works involving clearing of Porcupine Grass Sparse Woodland. Biosis was responsible for supervising the demarcation of the clearing works, recording the disturbance footprint and calculating the amount of hectares cleared. CATCON was then using this information to update the register. At the time of the audit the Porcupine Grass Sparse Woodland Clearance Register detailed that 5.3 hectares of Porcupine Grass Sparse Woodland had been cleared indicating 1.5 hectares of allowable clearing remaining. MCW Environmental Auditors did not independently verify the calculation of the areas cleared and have relied upon the data provided by CATCON for this assessment. CATCON maintains a Mulga/Red Mallee Shrubland Clearance Register. This register identified that 0.165 hectares of Mulga/Red Mallee Shrubland had been cleared at the time of the audit (during two clearing events), indicating that there was 0.375 hectares allowable clearing remaining.</p> <p>b) Known raptor nest locations (identified during the EA) were included on the relevant Issued for Construction (IFC) Drawings. Two raptor nest locations were identified within the vicinity of T55-T56 and T34. These were shown on Drawings STWF-CG0-EL-DR-1098 Sh1_C-01 and STWF-CG0-EL-DR-1098 Sh3_C-01. No identified raptor nests are within 200m from the closest turbine.</p> <p>c) Drawing STWF-CRI-CI-DR (Civil Works Access Track Layout Plan Sheet 27, 12.06.2017) highlights the Barrier Range Dragon Habitat areas. The plan does not identify any works as having occurred in the areas marked as Barrier Range Dragon Habitat area. Based on this</p>	<p>Not Verified (f) for Wind Farm</p> <p>2018 IEA OFI 12 AGL to confirm clearing limits through a quality review of data utilised in the development of the Porcupine Grass Sparse Woodland Clearance Register.</p> <p>2018 IEA REC 03 Finalise and Implement the Porcupine Grass Sparse Woodland Recovery Plan so as to demonstrate the protection and enhancement of the Porcupine Grass Sparse Woodland CEEC on site.</p>

Reference	Condition	Comments	Audit Finding
		<p>drawing, it has been assumed that no development has occurred in the Barrier Range Dragon Habitat area. MCW Environmental auditors did not ground truth this plan against the site activities undertaken at the time of the site inspection. However, Auditor's checked during site inspection one barrier range dragon habitat area which was in proximity to construction works. No construction related impacts were sighted in this area.</p> <p>d) There is no treed vegetation close to wind turbines. Turbines have been generally placed on the ridgeline. Rocky outcrops have been avoided as per the IFC drawings, due to the barrier range dragon habitats, however, given the extent of rocky outcrops of the Barrier Range, not all outcrops were able to be avoided at all turbine locations. Drawings show cave and shaft locations.</p> <p>e) Impacts on Barrier Range Dragon, threatened bird and bat populations, native woodland vegetation and fauna habitat, standing dead trees and woody habitat and high biodiversity value vegetation communities were minimised during the design process. The final design was reviewed by the Project Manager, in consultation with the design consultants to ensure that for the areas which cannot be avoided, the impacts were minimised. The final design was then issued to the Principal's Representative for review and approval prior to the issue of IFC drawings incorporating the biodiversity constraints to the workforce for construction. IFC drawings were sighted by the auditors which showed some of these environmental constraints mapped.</p> <p>Impacts were also minimised through the implementation of a Ground Disturbance Permit (GDP) process. The GDP process involves: permit request prepared which includes control measures and additional comments, check of whether the area contains any Porcupine Grass Sparse Woodland, Barrier Dragon habitat, check if the area has been assessed for any new Porcupine Grass Sparse Woodland, Barrier Dragon habitat and inclusion of photographs; permit issued by Project Manager, Supervisor brief work crew of requirements of permit including any sensitive areas and control measures to be implemented; disturbance area to be clearly pegged out and any sensitive items demarcated. The GDP Register as well as examples of completed GDPs were reviewed by the auditor indicating that the process was being implemented.</p> <p>f) One of the biggest threats to the Porcupine Grass Sparse Woodland community was reported to be the wild population of goats which feed on the leaves of the Mallee. Goats are used as a commodity by local farmers. A Goat Management Plan has been developed for the Operational Phase to assess impacts and detail controls to assist with this. This Plan was not approved at the time of this audit hence has not been reviewed or considered as part of this audit report.</p> <p>The Biodiversity Management Plan was revised to reflect the additional area of Porcupine Grass Sparse Woodland to be cleared. The Biodiversity Management Plan reports that careful positioning by design of the access roads, power poles and underground cables has occurred to minimise the impacts on the Porcupine Grass on site.</p> <p>Works on site showed there has been a net loss of area of the Porcupine Grass Sparse Woodland CEEC on site (discussed above). The CATCON Biodiversity Management Plan for the construction phase stated <i>"To ensure compliance with condition 18 of schedule 3 of the MOD 3 project approval, a recovery plan for the Porcupine Grass - Red Mallee - Gum Coolibah hummock grassland vegetation community must be prepared in consultation with OEH, the DPI Lands and local leaseholders on site. In December 2017, a draft version of the recovery plan was submitted to the Secretary of the DPE."</i> This document was not reviewed by the Auditors, and was understood to still be in Draft form at the time of the preparation of this audit report.</p> <p>Given the timing of the audit, there has been no time to implement remedial actions described in the Operational Plans to <i>"enhance the Porcupine Grass Sparse Woodland CEEC on site (see figure in Appendix 5) to ensure there is a net gain in the conservation value of this community"</i> as required of the condition (part f). It would be expected that to comply with the condition AGL would be required to implement the plan over a number of years to be in a position to demonstrate <i>"enhancement"</i> and <i>"net gain in conservation value"</i>. Given this, auditors were not able to verify compliance with part f) of this condition.</p> <p>Connection Works</p> <p>Clearing of vegetation was contained kept to three locations at Lakes Grave Creek, Lakes Creek</p>	

Reference	Condition	Comments	Audit Finding
		<p>and Umberumberka. NJ Construction was contracted by TransGrid to conduct risk assessments of proposed vegetation clearing. The Risk Assessment dated 8.12.2017 for the clearing of significant timber on the transmission line easement at Lakes Grave Creek, Lakes Creek and Umberumberka was sighted by the auditors. In addition pre-clearance inspections were conducted as well as the clearing itself being supervised by an ecologist (sighted letter report from Ecologist Ms Clifford dated 10.01.18 outlining the findings of the pre-clearing inspections and clearing activities).</p> <p>TransGrid reported that no Porcupine Grass Sparse Woodland or Mulga/Red Mallee shrubland was affected.</p> <p>Based on the relatively minor extent of the Connection Works and limited impacts on the Porcupine Grass Sparse Woodland CEEC and the Barrier Range Dragon habitat, the connection works are considered compliant with the condition.</p>	
SH3COA18	<p>Biodiversity Management Plan: Prior to the commencement of construction, the Proponent must prepare a Biodiversity Management Plan for the project in consultation with OEH, DI Lands and local leaseholders on site, and to the satisfaction of the Secretary. This plan must:</p> <p>(a) include updated baseline mapping of the vegetation communities and key fauna habitat onsite;</p> <p>(b) clearly identify the areas on site that would be disturbed;</p> <p>(c) include a:</p> <ul style="list-style-type: none"> • description of the measures that would be implemented for: <ul style="list-style-type: none"> - minimising the amount of clearing within the approved project footprint; - minimising the loss of key fauna habitat; - minimising the impacts on fauna on site, including undertaking pre-clearance surveys; - rehabilitating and revegetating temporary disturbance areas; - protecting vegetation and fauna habitat outside the approved disturbance area; - maximising the salvage of resources within the approved disturbance area - including rocks, vegetation and soil resources - for beneficial reuse (including revegetation and fauna habitat enhancement) on site; - collecting and propagating seed (where relevant); - controlling weeds and feral pests; - controlling erosion; - controlling access; and - bushfire management; • Recovery Plan for enhancing the conservation value of the Porcupine Grass Sparse Woodland CEEC on site, that includes: <ul style="list-style-type: none"> - baseline data on the vegetation and fauna habitat within the community; and - detailed performance and completion criteria for evaluating the performance of the enhancement activities; • Barrier Range Dragon Management Plan for minimising any impacts on the species on site and enhancing the potential habitat for this species; • Goat Management Plan for the site; • Vegetation Management Plan for restoring vegetation and habitat in the temporary disturbance areas and clearing vegetation for transmission line maintenance; and • include a detailed program to monitor and report on the performance of these measures. Following the Secretary's approval, the Proponent must implement the Biodiversity Management Plan. 	<p>Wind Farm Works</p> <p><u>Preparation</u></p> <p>GE-CATCON engaged EHP to prepare a Construction Biodiversity Management Plan (BMP). The original BMP did not include Area 7 as this portion of the works was put on hold and access to Area 7 temporarily restricted to enable a detailed site investigation to be undertaken prior to preparing the final design for the wind farm infrastructure. This was required to address the requirement to not clear more than 0.81 ha of Porcupine Grass Sparse Woodland. As discussed under SC3COA17 following the detailed site investigation DPE approval was obtained to clear up to 6.81 hectares. The original BMP (without Area 7) was approved by the DPE by letter dated 5.05.17. The revised BMP (including Area 7) was approved by the DPE by letter dated 12.03.18. The plan states that OEH was consulted on the 8.03.17 and feedback received on the 24.03.17 (not sighted by auditors). The auditors did sight emails to the DPE which referred to meetings with OEH.</p> <ol style="list-style-type: none"> The BMP includes the baseline mapping of the vegetation communities and fauna features on site that was prepared as part of the MOD 3 project approval as Appendix A and Appendix B. The Plan states that GE-CATCON intends to update these maps as part of ongoing revisions to the BMP. At the time of the audit this had not been undertaken. Appendix C to the BMP provides the Roads Master Plan which identifies the roads as the largest component of the disturbance on site. Other elements shown on the Road Master Plan which involve smaller amounts of disturbance include turbine locations, underground and overhead cables, concrete batch plant, construction compound, O&M building, substation, meteorological masts and power poles. The BMP describes the GDP process which further identifies the areas on site that would be disturbed at a micro-level and imposes demarcation of the area to be disturbed on the ground. Section 5.1 and Table 2 describes measures for minimising the amount of clearing. Section 5.2 and Table 3 describes measures for minimising the loss of key fauna. Section 5.3 and Table 4 describes measures for minimising impacts on fauna on site. Section 4.2 describes the measures to be implemented prior to disturbance and outlines the GDP process. Section 5.4 and Table 5 discusses rehabilitating and revegetating temporary disturbance areas. It commits to undertaking progressive rehabilitation as soon as reasonably practicable however does not include details of how this would be undertaken. Section 5.5 and Table 6 describe measures for protecting vegetation and fauna habitat outside the disturbance area. Section 5.6 and Table 7 describes measures for maximising the salvage of resources. Section 5.7 and Table 8 describes measures for collecting and propagating seed. Section 5.8 and Table 9 describes measures for controlling weeds and feral pests. Section 5.9 and Table 10 describes measures for controlling erosion. Section 5.10 and Table 11 describes measures for controlling access. Section 5.11 and Table 12 describes measures for bushfire management. The BMP does not include a Recovery Plan for Porcupine Grass Sparse Woodland. The BMP states that this is required for the operational phase of the project. In its letter to the DPE dated 13.04.18 GE-CATCON submitted a Staging Plan in accordance with SH2COA17 for the DPE's approval. The Staging Plan outlined the commissioning program which included discussion of the Operational Environmental Management Plans. As part of the discussion of the OEMP, GE-CATCON included the 	<p>Preparation: Not Verified</p> <p>Implementation: Compliant</p> <p>2018 IEA OFI 13 Ensure that in active construction areas flagging or other suitable delineation is maintained to define where CEECs, other sensitive areas and where there is a potential for vehicles to track onto native vegetation.</p> <p>2018 IEA OFI 14 Conduct more seed collection onsite to ensure sufficient seed storage for rehabilitation. Seeds collected from site should be routinely used in rehabilitation where topsoils are not available to spread out over disturbed areas.</p> <p>2018 IEA OFI 15 Update the Connection Works Construction Biodiversity Management Plan for Operations or pull out the requirements relating to post construction rehabilitation, restoration and weed control into an operational document so that they are not</p>

Reference	Condition	Comments	Audit Finding
		<p>Porcupine Grass Sparse Woodland Recovery Plan, Vegetation Management Plan and Goat Management Plan and reflected that it intended to submit the plans to the DPE in April 2018. The letter also included as Attachment 2 a detailed background of the status of development of the OEMP.</p> <p>Appendix D of the BMP includes a Barrier Range Dragon Management Plan.</p> <p>Monitoring and reporting is discussed in Section 10.1 and Table 13.</p> <p>It is noted that the Porcupine Grass Sparse Woodland Recovery Plan, Vegetation Management Plan and Goat Management Plan were not included in the BMP which was required (as per the condition) prior to construction and that approval for the staged approach to include these plans with the OEMP was not sought until April 2018 (post construction). However, it is noted that DPE were informed via letter titled 'Pre-Mobilisation Documentation for Approval' dated 27.04.17 that the Recovery Plan for Porcupine Grass Sparse Woodland, Goat Management Plan and Vegetation Management Plan would be prepared prior to the commencement of operations as per the Statement of Commitments. The DPE subsequently approved the BMP (without the required plans) by letter dated 5.05.17. Further, the approved WEMS (SH4COA1) described that various aspects of the plans within the Biodiversity Management Plan would be further developed and issued at a date post commencement of construction (Sections 2.1 to 2.4). On the basis that approval for a staging plan allowing staged submission of the sub plans was not clear prior to construction, and considering DPE approvals of the BMP and the WEMS, compliance with the condition is not clear and hence is considered Not Verified.</p> <p><u>Implementation</u></p> <p>The BMP was considered to have been generally implemented on site. This included:</p> <ul style="list-style-type: none"> • Biodiversity constraints were factored into the design process as evidenced by IFC drawings • The GDP process was well established as evidenced by the GDP Register and examples of completed GDP Permits. • Areas to be disturbed were inspected by an ecologist (or delegate) prior to works commencing to review potential habitat. Interviews with the ecologist from EHP indicated that early pre-clearance surveys were undertaken by the ecologist however during the project the ecologist trained two site engineers on aspects relating to inspecting proposed disturbance areas for potential habitats for native vertebrate animals to enable them to act as his delegate (sighted letter dated 31.08.2017 by EHP verifying that training had been provided). • Inspections were being undertaken monthly by EHP and bi-monthly by Jacobs. A review of various inspection reports indicated that issues identified were being actioned and closed out. • Works in Area 7 were supervised by an ecologist from Biosis (sighted letter of confirmation by Biosis dated 4.06.18). • Earthmoving equipment was checked for dirt as part of Plant Inspection Checklist (examples of checklists sighted). Minimal weeds were observed on site during the site inspection. • A seed collection and sowing process was in place and was being managed by EHP. An email dated 07.05.18 from EHP was sighted detailing the seed collection and sowing procedure proposed to rehabilitate the temporary material pads, the temporary laydown areas, large road/hardstand batters, and long sloping sections of the underground cable route. Rehabilitation was in the process of being commenced at the time of the audit and as such limited progressive rehabilitation was visible to the auditors. • Open trenches that were fenced and covered - No incidents reported of a trapped vertebrate in a cable trench left open overnight. • Waste rock was being used for creating habitat. Observed examples of where this had occurred. • Sediment fencing was in place in some limited areas. Trapped sediment sighted in sediment fence at the base of the batch plant. Numerous issues however were identified relating to erosion and sediment control under SH3COA16 and in the main report. No erosion was observed to have had an impact on vegetation, however, at the time of the site inspection for the audit there was a potential for erosion to occur in the event of a heavy rain event with the controls in place at that time. 	<p>overlooked now that construction activities are complete.</p> <p>2018 IEA OFI 16 Implement controls for goats as part of the approved Goat Management Plan. Refer to recommendations for other conditions relating to rehabilitation and erosion and sediment control.</p>

Reference	Condition	Comments	Audit Finding
		<ul style="list-style-type: none"> No blasting was permitted to occur on total fire ban days. Speed limit on the entrance road was signposted as 40km/h to minimise collisions between construction traffic and vertebrate fauna. Food waste was observed to be stored in covered bins. Goats were observed as being active and common across the Wind Farm site. Flagging to demarcate disturbed areas from undisturbed areas had fallen down in places or in places was not present. As areas have been completed, use of flagging has been reduced. Some seed was observed to have been collected on site to for rehabilitation purposes by the EHP environmental consultant. The volume of seed however was considered minimal in comparison to the significant areas of rehabilitation required to be conducted. An increased rate of collecting seed is considered to be required in order to have sufficient seed for rehabilitation, particularly in light of not being able to establish that topsoils were salvaged and re-used for rehabilitation. <p>Areas for improvement include progressive rehabilitation of disturbed areas. As previously stated, the BMP does not include much guidance on how this will be implemented. Refer also to SC3COA36.</p> <p>Further areas of improvement are in the implementation of erosion and sediment controls. This is discussed in detail in relation to specific conditions covering erosion and sedimentation including SH3COA16.</p> <p>Generally, the key aspects of the BMP are considered to have been implemented, and on this basis the plan is considered to have been generally implemented in compliance with the condition, subject to the comments made on rehabilitation and erosion and sediment controls.</p> <p>Connection Works</p> <p><u>Preparation</u></p> <p>The TransGrid Biodiversity Management Plan was approved by DPE on 31.05.2017 (Letter from DPE sighted) and is inclusive of a restoration plan. The Plan appeared to address the requirements of the Condition. A detailed review of this plan was not undertaken as construction activities associated with the Connection Works had been largely completed at the time of the audit. The Plan did include discussion of rehabilitation and restoration under Protocol 8. Protocol 8 included rehabilitation benchmarks and indicators and made a commitment that rehabilitation would be monitored biannually following construction until benchmarks are met by the ESR or delegate. Protocol 7 Weed Control included a commitment for post construction weed monitoring to be undertaken after the first significant rainfall event and at 1, 3 and 6 month intervals to ensure any new infestations are treated. As these requirements are included in a construction document and construction activities are complete, there is a risk that these requirements may be overlooked.</p> <p><u>Implementation</u></p> <p>The Connection Works ESR conducted fortnightly inspections of the site which included an assessment of biodiversity issues.</p> <p>Weed Management Plan (NJ, Oct 2017) was in place for Mexican Poppy and African Boxthorn. Main controls included the brush down process which was reportedly in place at CN42 and CN43. Prior to construction NGH (ecologist) identified weeds on site which were reported in the EIS. Weed control was reportedly conducted in Feb 2018.</p> <p>It was reported that topsoil was stockpiled for each pad/pole site. At the end it was placed over the pad and the pad slightly ripped to encourage seed regeneration. Photo dated 07.09.2017 sighted which shows typical stockpile at CN40. Photo dated 07.02.18 sighted which shows CN65 with topsoil spread over for rehabilitation.</p> <p>During the audit site inspection rehabilitation efforts were observed (soils lightly ripped to provide a rough uncompacted surface, and areas free of stockpiles and rubbish). It was not able to be fully assessed if surface soils containing the seed bank had been collected and saved for later spreading over rehabilitated areas given construction works had ceased. Given the very dry conditions, growth was not observed. It is acknowledged that it may take a long time for disturbed areas to rehabilitate and will be weather dependent.</p> <p>Rehabilitation efforts including implementation of post construction rehabilitation and weed monitoring will be better assessed in future audits.</p>	

Reference	Condition	Comments	Audit Finding
SH3COA19	<p>Bird and Bat Adaptive Management Plan: Prior to the construction of any wind turbines, the Proponent must prepare a Bird and Bat Adaptive Management Plan for the project in consultation with OEH to the satisfaction of the Secretary. This program must include:</p> <p>(a) baseline data on threatened and 'at risk' bird and bat species and populations in the locality that could potentially be affected by the project;</p> <p>(b) a detailed description of the measures that would be implemented on site for minimising bird and bat strike during the project, including:</p> <ul style="list-style-type: none"> • locating turbines as far as possible away from any raptor nests; • minimising the availability of raptor perches; • prompt carcass removal; • controlling pests; • using best practice methods for bat deterrence; and • adaptive management of turbines to reduce mortality; and <p>(c) trigger levels for further investigation of the potential impacts of the project on particular bird or bat species or populations, and the potential implementation of measures to enhance or protect these species or populations in the locality; and</p> <p>(d) a detailed program to monitor and report on the effectiveness of these measures, and any bird or bat strikes on site.</p> <p>Following the Secretary's approval, the Proponent must implement the Bird and Bat Adaptive Management Plan, and incorporate it into the Biodiversity Management Plan.</p>	<p>Wind Farm Works</p> <p><u>Preparation</u></p> <p>The Bird and Bat Adaptive Management Plan (BBAMP) was developed by Biosis on behalf of GE-CATCON and was approved by DPE on 30 November 2017 on the basis that supplementary comments provided by OEH dated 29 November 2017 are addressed in the next submission of the staged BBAMP (DPE letter dated 30.11.17).</p> <p>The revised BBAMP was resubmitted to OEH and DPE incorporating the spring survey results and responses to OEH comments. The revised BBAMP was approved by DPE on 02 May 2018 prior to commissioning of the turbines the following week.</p> <p>a) Section 2 includes baseline data on threatened and at risk bird and bat species and populations</p> <p>b) Section 5 describes management measures to minimise impacts on birds and bats. This includes:</p> <ul style="list-style-type: none"> - turbine locations relative to raptor nests; - minimising raptor perch sites - large animal carcass removal - pest animal control - deterrence of bats from turbines - adaptive management to reduce collisions <p>c) Section 3 includes significant impact and trigger levels</p> <p>d) Section 4 describes the monitoring program. This includes recommendations proposed by OEH on the 3 May 2018 via email from DPE which are included as Appendix 7 to the BBAMP.</p> <p><u>Implementation</u></p> <p>A number of the requirements of the plan were not triggered at the time of the audit as they related to operational requirements.</p> <p>For the actions required prior to / during commissioning, the following are noted:</p> <ul style="list-style-type: none"> • GE contracted NGH to conduct field surveys in the past. This will be transitioning from construction to operational monitoring in the near future. The auditors reviewed the surveys conducted to date and note that the last survey was conducted in Autumn 2018 and the next one is schedule to be undertaken in Spring 2018. • Biosis were engaged to conduct incidental turbine mortality surveys onsite. Survey inspection records from 17 May, 4 June and 17 June 2018 were reviewed by the auditors. It was reported that searches will be conducted in this manner until the site reaches the 29 operating turbines as stated in the BBAMP. Once operational turbines reaches >29 formal turbine collision carcass searches will be conducted in accordance with the BBAMP. • GE was in the process of applying for a permit under the <i>Biodiversity Conservation Act 2016</i> to collect and store bird and bat carcasses. In the meantime, Biosis, as permit holders were conducting searches on GE's behalf. • Toolbox induction had been provided by Biosis to site personnel on procedures for dealing with injured birds and bats found incidentally (sighted records dated 04.05.18). It was reported that further on-site inductions will be conducted by Biosis prior to Service Personnel taking over the incidental searching. • A freezer was purchased for the purpose of holding potential bird and bat carcasses. The freezer was sighted during the audit site inspection. At the time of the audit, no bird or bat carcasses had been found. • No large animal carcasses had been found during the audit period. It was reported that the incidental mortality surveys included looking for large animal carcasses. 	Compliant
HERITAGE			
SH3COA20	<p>Protection of Heritage Items: The Proponent must ensure the project does not cause any direct or indirect impact on the heritage items identified in Table 3.</p>	<p>Wind Farm Works</p>	Compliant

Reference	Condition	Comments	Audit Finding				
	<p><i>Table 3: Heritage Items</i></p> <table><tr><th><i>Indigenous Heritage Item</i></th><th><i>Historic Heritage Item</i></th></tr><tr><td>SU 268/L3 SU 277/L2</td><td>SU 53/HS1 SU 235/HS1 SU 239/HS1</td></tr></table>	<i>Indigenous Heritage Item</i>	<i>Historic Heritage Item</i>	SU 268/L3 SU 277/L2	SU 53/HS1 SU 235/HS1 SU 239/HS1	<p>The five sites specified in Table 3 are shown on IFC drawings as significant heritage items. The project was designed to avoid these five sites.</p> <p>CATCON indicated that they had not impacted any of the sites listed, and that the sites were not close to their works. The site named SU53/HS1 (the Blue Anchor Tank) was sighted by the Lead Auditor and was observed to be away from CATCON activities. Some demarcation fencing between it and the site works was observed, and did need some minor repairs which were completed during the inspection.</p> <p>Based on the above CATCON were considered to be compliant with this condition, noting that only one of the sites was visited by the Auditors.</p> <p>Connection Works</p> <p>Of the five sites specified in Table 3, only one (SU 277/L2) was located in the substation and transmission line easement.</p> <p>SU 277/L2 was located near the transmission line, south of CN14 and north of The Lakes Creek. TransGrid reported that this site was not impacted by the Connection Works. Photos dated 9.11.17 were sighted showing signs erected east and south of SU77/L2 and fencing in the vicinity of CN14.</p>	
<i>Indigenous Heritage Item</i>	<i>Historic Heritage Item</i>						
SU 268/L3 SU 277/L2	SU 53/HS1 SU 235/HS1 SU 239/HS1						
SH3COA21	<p>Heritage Management Plan: Prior to the commencement of construction, the Proponent must prepare a Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;</p> <p>(b) be prepared in consultation with OEH, Aboriginal stakeholders (in relation to Aboriginal heritage) and any local historical organisations (in relation to historical heritage);</p> <p>(c) include updated baseline mapping of the heritage items on site (see the figures and tables in Appendix 6);</p> <p>(d) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none">• managing the discovery of human remains or previously unidentified heritage items;• conducting further archaeological and heritage assessment in any disturbance areas where this assessment has not already been carried out; and• ensuring any workers on site receive suitable heritage inductions prior to carrying out any work on site; <p>(e) include the following for the management of Aboriginal heritage:</p> <ul style="list-style-type: none">• a description of the measures that would be implemented to:- protect the heritage items outside the project disturbance area;- minimise and manage the impacts of the project on heritage items within the disturbance area, including:o any proposed archaeological investigations and/or salvage measures; ando a strategy for the long-term management of any items or material that are collected during any of these archaeological or works;- monitor and report on the effectiveness of any mitigation measures and any heritage impacts of the project;- maintain and manage reasonable access for Aboriginal stakeholders to heritage items on site; and- provide for ongoing consultation with Aboriginal stakeholders in the conservation and management of Aboriginal cultural heritage on site; <p>(f) include the following for the management of historic heritage:</p> <ul style="list-style-type: none">- a description of the measures that would be implemented to:- protect the heritage items outside the project disturbance area;- minimise and manage the impacts of the project on heritage items within the disturbance area, including:- archaeological test excavations or salvage of all sites of local significance in accordance with the NSW Heritage Manual; and- photographic and archival recording of all heritage items that would be affected by the project; and monitor and report on the effectiveness of these measures and any heritage impacts of the project. <p>Following the Secretary's approval, the Proponent must implement the Heritage Management Plan.</p>	<p>Wind Farm Works</p> <p><u>Preparation</u></p> <p>a) The Construction Heritage Management Plan (HMP) was prepared for GE-CATCON by EHP. EHP were approved by the DPE as suitably qualified by letter dated 23.02.17. The HMP was initially approved by the DPE on 5.05.17. Following approval for Area 7 construction to commence the plan was updated and submitted for approval on 22.02. 18. The DPE approved the revised HMP on 12.03.18.</p> <p>b) Section 3 of the HMP outlines the consultation undertaken in developing the plan. It states that OEH were consulted on the 8.03.17 and provided comments via letter dated 24.03.17. The HMP states that the Broken Hill Local Aboriginal Land Council (BHLALC), Broken Hill Historical Society Incorporated and the Silverton Village Committee were consulted.</p> <p>c) Baseline mapping of the heritage items on site are included in Appendix B. These maps updated the maps included in the MOD 3 project approval and included new heritage items identified by EHP in 2017.</p> <p>d) Section 5.1 and Table 2 describes measures for dealing with human remains.</p> <ul style="list-style-type: none">a. Section 5.2 and Table 3 describes measures for dealing with new heritage itemsb. Section 5.3 and Table 4 describes measures to ensure workers on site receive suitable heritage inductions <p>e) Section 6 describes measures for the management of Aboriginal heritage including:</p> <ul style="list-style-type: none">a. Measures to protect items outside the disturbance area (Section 6.2 and Table 5)b. Measures to manage impacts within the disturbance area (Section 6.3 and Table 6)c. Measures to monitor and report on impacts to Aboriginal heritage (Section 6.4 and Table 7)d. Maintaining access for Aboriginal stakeholders (Section 6.5 and Table 8)e. Ongoing consultation with Aboriginal stakeholders (Section 6.6 and Table 9) <p>f) Section 7 describes measures for the management of historic heritage including:</p> <ul style="list-style-type: none">a. Measures implemented to protect items outside the disturbance area (Section 7.1 and Table 10)b. Measures to manage impacts within the disturbance area (Section 7.2 and Table 11)c. Measures to monitor and report on impacts to historic heritage (Section 7.3 and Table 12) <p><u>Implementation</u></p> <p>The HMP was considered to have been generally implemented on site. This included:</p> <ul style="list-style-type: none">• Aboriginal and historic heritage constraints and features were factored into the design process as evidenced by IFC drawings.• The GDP process was well established as evidenced by the GDP Register and examples	<p>Compliant</p> <p>2018 IEA OFI 17 Conduct a reconciliation of which aboriginal heritage items were impacted and update the Wind Farm Works HMP to reflect this.</p> <p>2018 IEA OFI 18 Update the Wind Farm Works HMP to include new aboriginal heritage items identified since March 2018 (both maps in Appendix B and list in Appendix C).</p>				

Reference	Condition	Comments	Audit Finding
		<p>of completed GDP Permits. The GDP includes questions regarding Aboriginal and historic heritage and requires that a Cultural & Environmental Monitoring Record or Aboriginal Monitoring Record be attached to the GDP to assess each site which may be impacted. This Record requires an Indigenous elder to be present and provide sign off. It was reported that Indigenous elders have been involved with every clearing permit conducted post the EA. A review of a sample of GDPs indicated this was being recorded. For example, the GDP prepared on the 17.04.18 for laying of underground cable trench in Area 7 noted that monitors walked the site on the 12.04.18 and included sign off by representatives of the BHLALC. A number of other GDPs and Aboriginal Monitoring Records were also sighted and noted to be signed by BHLALC Representatives.</p> <ul style="list-style-type: none"> • Monthly inspections were conducted by EHP which included a review of heritage controls. Inspection reports for July, August and September 2017 were reviewed and satisfy the monitoring and reporting requirements outlined in the HMP. • Toolbox Talks on 19.05.17 (by Aboriginal elders), 31.05.17 (historic heritage by EHP), 6.07.17 (Aboriginal elders and EHP) were viewed by the auditors and included reference to heritage management requirements on site. • As stipulated by the HMP, for items where impacts could not be avoided a minimum requirement was that the items undergo photographic and archival recording and if appropriate a salvage excavation would occur. This was triggered for two historical heritage sites in the turbine envelope of T49. EHP prepared a report which detailed the photographic record of heritage items SU90/HS3 (forge) and SU90/HS4 (building platform). The report stated that a salvage excavation was not warranted as the remaining material was unlikely to have any research potential. The report stated that following the archival recording, the heritage sites were destroyed. • New finds had occurred including four historic and 21 Aboriginal heritage items. These items were identified during a road survey and at the time of the audit had not been included in the HMP. The auditors were informed that these will be included in the Operational HMP. This plan was in Draft at the time of the audit and was not reviewed by the auditors. • Information about the new Aboriginal heritage items discovered was reportedly provided to the OEH using the Aboriginal Site Recording Form. Examples of completed Aboriginal Site Recording Forms were sighted by the auditors. • Information about the new historic heritage items was reportedly provided to Broken Hill City Council and the heritage Council of NSW. Evidence of this was not sighted. • It was reported that 15 Aboriginal heritage sites were impacted by the wind farm works and Aboriginal Site Impact Recording Forms completed. A summary of the Aboriginal heritage sites that were impacted was sighted by the auditors as well as examples of completed OEH Aboriginal Site Impacts Recording Forms. Of the 15 sites, it was reported that one site was destroyed (SU76/L1), five sites were partially destroyed (SU2/L3, SU3/L1, SU9/L1, SU10/L1, SU52/L1) and nine sites were not considered a site. • It was reported that no human remains had been identified during construction activities at the time of the audit. <p><u>Connection Works</u></p> <p><u>Preparation</u></p> <p>A Construction Heritage Management Plan was prepared by heritage expert Dr Julie Dibden of NSW Archaeology Pty Ltd. Dr Dibden was approved as suitably experienced and qualified to prepare the Plan by the DPE by letter dated 25.05.17. The plan was approved by DPE by letter dated 31.05.17. The Plan appeared to address the requirements of the Condition. A detailed review of this plan was not undertaken as construction activities associated with the Connection Works had been largely completed at the time of the audit.</p> <p><u>Implementation</u></p> <p>The following are noted regarding implementation of the Construction Heritage Management Plan for the Connection Works:</p> <ul style="list-style-type: none"> • Two items were salvaged during the connection works: SU141/L1 (at Pole CN9) and SU278/L2 (at Pole CN63). It was reported that Aboriginal stakeholders accompanied the archaeologist during salvage works. • A partially exposed mine shaft was identified during connection works. The site requested 	

Reference	Condition	Comments	Audit Finding
		<p>the archaeologist review the shaft and provide advice as to whether the shaft had heritage significance. The archaeologist advised that the mine shaft held no significance, was not on any heritage registers and could be filled in. The shaft was filled in as a safety precaution for workers working in the vicinity of the shaft.</p> <ul style="list-style-type: none"> • No unexpected Aboriginal heritage items were identified during connection works. • The Connection Works ESR conducted fortnightly inspections of the site which included an assessment of heritage issues. Examples were sighted. • Heritage issues were included in the site inductions • Site Environmental Plans (described in the Plan and an example provided in Appendix D) were not produced for each site during the Connection Works. 	
TRAFFIC			
SH3COA22	Designated Heavy or Over-Dimensional Vehicle Routes: The Proponent must ensure that all heavy or over-dimensional vehicles entering or leaving the site use the designated heavy and over-dimensional vehicle route for the project (see the figure in Appendix 7).	<p>Wind Farm Works</p> <p>The auditors inspected the Designated Heavy or Over-Dimensional Vehicle Routes which were found to be operational and appeared adequate for their purpose.</p> <p>The auditors reviewed the contractor induction process and training requirements including toolbox talks presented for the site which included aspects of transport routes and access requirements.</p> <p>The auditors were informed that all vehicle movements were via the main site entrance with the exception of the emergency route which was used by site personnel for accessing landholders. The emergency route was not however used by over-dimensional vehicles.</p> <p>Connection Works</p> <p>Over-dimensional vehicles were required to access site to deliver the main transformer. Permits from RMS and Broken Hill City Council (and other relevant Councils i.e. Newcastle City Council) were obtained for the transformer delivery. Signed permits are included in Appendix A of the Construction Transport and Access Management Plan (CTAMP) and include over-dimensional vehicle movements on 22.11.2017.</p>	Compliant
SH3COA23	Designated Heavy or Over-Dimensional Vehicle Routes: The Proponent must minimise the use of the designated heavy and over-dimensional vehicle route to the west of the Silverton Road/Daydream Mine Road intersection during the project.	<p>Wind Farm Works</p> <p>Refer to SC3COA22. It was reported by CATCON that the route to the west of the Silverton Road/Daydream Mine Road was not used for over dimensional vehicles.</p> <p>Connection Works</p> <p>Review of over-dimensional vehicle delivery permits indicated that TransGrid did not use this route for the connection works.</p>	Compliant
SH3COA24	<p>Road Upgrade and Maintenance Strategy: Prior to carrying out any construction, or the decommissioning of the project, the Proponent must prepare a Road Upgrade and Maintenance Strategy for the project in consultation with RMS, DI Lands and Broken Hill City Council, to the satisfaction of the Secretary. The strategy must:</p> <p>(a) identify the road upgrades required for the project; and</p> <p>(b) include a program for:</p> <ul style="list-style-type: none"> • the implementation of the road upgrades; and • the maintenance of the relevant sections of the road network following the upgrades. <p>Following the Secretary's approval, the Proponent must implement the Road Upgrade and Maintenance Strategy.</p>	<p>Preparation</p> <p>A Road Upgrade and Maintenance Strategy (RUMS) was prepared by GE-CATCON and submitted to DPE for approval on 29.03.2017. This RUMS was revised on a number of occasions with the latest version (Rev 3) dated 7.08.2017.</p> <p>Section 4.0 of the RUMS details records of consultation with DPE, RMS, DI Lands, Broken Hill City Council and the Silverton Community Committee. A summary of consultation is provided in Appendix I of the RUMS.</p> <p>a) The scope of the upgrade works is outlined in section 2.2 of the RUMS and includes:</p> <ul style="list-style-type: none"> • Upgrade of the Broken Hill Bypass road; • Upgrade of Daydream Mine Road; and, • Upgrade of Silverton Road. <p>b) A programme of upgrade works is provided in Section 2.5 of the RUMS and Section 3.0 of the RUMS details the maintenance works required of the road upgrades.</p> <p>DPE approved the RUMS and Traffic Management Plan on 5 May 2017 subject to the following additional conditions:</p> <ul style="list-style-type: none"> • Confirm the 'adaptive' mitigation and maintenance strategies for roads used by the project within 14 days of the date of this letter. 	<p>Not Verified</p> <p>2018 IEA REC 04 Ensure the RUMS has been updated to document the outcomes of the actions identified by the DPE in its approval of the Plan.</p>

Reference	Condition	Comments	Audit Finding
		<ul style="list-style-type: none"> Complete the proposed Silverton Road Trial, inclusive of a detailed action plan within 30 days of the date of this letter; Finalise the adopted works on Silverton Road to address the outcomes of the Road Safety Audit within 30 days of the date of this letter. Update the TMP and Road Upgrade and Maintenance Strategy to document the outcomes of the abovementioned actions within 40 days of the date of this letter. <p>The Revision History table in the front of the document indicates that the RUMS was updated on three occasions to incorporate RMS comments, the latest being Rev 3 dated 07.08.17. A letter was sighted dated 24.08.17 advising that RUMS Rev 3 was accepted by RMS. An email was sighted providing the RUMS Rev 3 to the DPE on the 24.08.17 and an acknowledgment email that it was received by the DPE sighted dated 25.08.17. It was not clear whether the DPE's approval conditions had been addressed. Whilst the RUMS indicated it was updated to reflect RMS comments, it was not clear whether the DPE's approval conditions had been addressed and whether the updated RUMS documented the outcomes of the required actions. This was not obvious based on a brief review of the RUMS and on this basis this condition has been assessed as not verified.</p> <p><u>Implementation</u></p> <p>The auditors sighted all required upgrade works during the audit site inspection except upgrades for the access to the Daydream Mine.</p> <p>Feedback was obtained from the RMS who stated that <i>"There are/were a number of intersection and road improvements required to be completed as part of the development. These works have been completed with one exception – the site access intersection with Daydream Mine Road. Works were done on this intersection that were contrary to the approved plan and we are working with the proponent's contractor, CATCON, to agree on a different intersection design that meets their and our requirements. Importantly, the current intersection alignment is not satisfactory and is being managed under a traffic control plan that includes reducing the speed zone temporarily on Daydream Mine Road. The other works have all been completed, however, RMS extended the liability period on these work for two years following identification of some construction deficiencies. For the purposes of your audit however, these construction deficiencies can be managed by RMS through the extension of the liability period."</i></p> <p>As indicated by RMS, at the time of the audit there were still works to be completed as part of the implementation of this Plan at the site access intersection with the Daydream Mine Road.</p>	
SH3COA25	Road Upgrades and Maintenance: The Proponent must carry out all the road works identified in the Road Upgrade and Maintenance Strategy to the satisfaction of the relevant roads authority.	<p>GE-CATCON sent a request to DPE on 04.12.2017 for DPE to approve practical completion of the road works identified in the RUMS. DPE conducted an inspection of the site on 07.12.2017. The auditors sighted the inspection record attached to DPE's letter of approval which was dated 13.12.2017. DPE was satisfied that the works required were completed and practical completion had been achieved.</p> <p>As per SH3COA24, RMS requires outstanding actions at the site access intersection with Daydream Mine Road. On this basis that these works are ongoing, and that RMS has confirmed that all other aspects of the RUMS has been implemented, this condition is considered Compliant (subject to the works being completed).</p>	<p>Compliant</p> <p>2018 IEA OFI 19 Continue working with RMS to complete the intersection upgrades at the Daydream Mine Road to the satisfaction of RMS.</p>
SH3COA26	Operating Conditions: The Proponent must ensure that: (a) project-related traffic does not track mud or dirt onto the public road network; (b) loaded vehicles entering or leaving the site have their loads covered or contained; (c) there is sufficient parking on site for all project-related traffic; (d) deliveries to the site are scheduled to avoid heavy or over-dimensional vehicles passing through Broken Hill during peak hours (ie. between 8:30 am and 9:30 am and 2:30 pm and 3:30 pm); and (e) construction and decommissioning activities are coordinated to minimise any disruption to local tourist events.	<p><u>Wind Farm Works</u></p> <p>Site inspection findings included:</p> <ul style="list-style-type: none"> a) No dirt or mud tracking was observed on the public road network. b) Induction slides were viewed by the auditors and include reference to covering loads. Most loads to site are equipment and often does not require covering. CATCON reported that there was little or no spoil imported to site with stone and fill made at the crushing plant on site. c) There was substantial parking on site such that parking off site was not needed nor would it be practical. d) Not applicable as there was a bypass in place to avoid the town of Broken Hill e) Daydream tourist mine is located past the site. There has been a lot of consultation conducted between CATCON and Daydream mine to avoid the 10am tourist run. No complaints had been reported regarding disruption to local tourist events. <p><u>Connection Works</u></p> <ul style="list-style-type: none"> a) Environmental Inspectors Inspection Reports make reference to a rain event which occurred on 	Compliant

Reference	Condition	Comments	Audit Finding
		<p>16.11.2017. Minutes from progress meeting on 22.11.2017 show that work was halted in order to prevent mud from being tracked onto the roads. No tracking was observed during site inspections, however works had ceased long before the site inspection.</p> <p>b) TransGrid CEMP details this as a requirement. No uncovered loads were recorded in the inspection reports viewed by the auditors.</p> <p>c) TransGrid reported that parking spaces were available at each pole site and at Broken Hill and Silverton Substations and were adequate.</p> <p>d) As above, bypass is in place to avoid Broken Hill town. In addition all over-dimensional deliveries were conducted in accordance with Council and RMS permits.</p> <p>e) It was reported that most movement occurred before 0700 or after 1700.</p>	
SH3COA27	<p>Traffic Management Plan: Prior to the commencement of construction, the Proponent must prepare a Traffic Management Plan for the project, in consultation with RMS, DI Lands and Broken Hill City Council, and to the satisfaction of the Secretary. This plan must detail the measures that would be implemented to:</p> <p>(a) minimise the traffic safety impacts of the project and disruption to local road users during the construction and decommissioning of the project, including:</p> <ul style="list-style-type: none"> • temporary traffic controls, including detours and signage; • notifying the local community about project-related traffic impacts; • responding to any emergency repair or maintenance requirements; • implementing a strategy for minimising the traffic impacts associated with the use of over-dimensional vehicles; <p>(b) ensure the project does not disrupt the use of any travelling stock route on site;</p> <p>(c) comply with the traffic-related conditions in this approval; and</p> <p>(d) include a drivers code of conduct that addresses:</p> <ul style="list-style-type: none"> • travelling speeds; • procedures to ensure that drivers adhere to the designated heavy and over-dimensional vehicle routes; • procedures to ensure that drivers implement safe driving practices, particularly if using roads through Broken Hill or Silverton; and • monitor and report on the effectiveness of these measures and the code of conduct. <p>Following the Secretary's approval, the Proponent must implement the Traffic Management Plan.</p>	<p>Wind Farm Works</p> <p><u>Preparation</u></p> <p>GE-CATCON submitted the Traffic Management Plan (TMP) to DPE for approval on 29.03.2017. DPE approved the plan on 5 May 2017 subject to the following additional conditions:</p> <ul style="list-style-type: none"> • Confirm the 'adaptive' mitigation and maintenance strategies for roads used by the project within 14 days of the date of this letter. • Complete the proposed Silverton Road Trial, inclusive of a detailed action plan within 30 days of the date of this letter; • Finalise the adopted works on Silverton Road to address the outcomes of the Road Safety Audit within 30 days of the date of this letter. • Update the TMP and Road Upgrade and Maintenance Strategy to document the outcomes of the abovementioned actions within 40 days of the date of this letter. <p>The TMP states that it was prepared in consultation with RMD, DI Lands and Broken Hill City Council, however correspondence to verify this was not sighted by the auditors. Section 11.1 of the TMP includes a record of community and stakeholder consultation. The auditors did sight emails between RMS and GE-CATCON referring to contents of the TMP.</p> <p>a) With regards to the specific requirements of Condition 27(a):</p> <ul style="list-style-type: none"> • Schedule 3, Table 5-1 details construction site signage to be installed at work locations. Section 2.1.2 outlines that festivals in Silverton may require construction traffic to cease, in consultation with the community consultation committee. • Section 6.1.2 states that consultation will occur before and during all haulage activities with the community and tourist groups. Section 8.2 outlines that community notification with regards to over-dimensional traffic movements will occur via project notice boards, project websites etc. • Section 7.2 outlines that any damage that may occur will be repaired by the Principal Contractor with the approval of RMS in an agreed timeframe. • Over-dimensional loads are managed in accordance with Section 8.0 of the TMP. <p>b) It is unclear from review of the TMP if the project interferes with any travelling stock routes on site. The TMP does not outline where the stock routes are or any additional management measures other than the following; Section 6.1 'Drivers Code of Conduct' states that 'Extra care should be taken when driving at dawn or dusk, being particularly watchful for wildlife and/or livestock and Vehicles must give way to pedestrians, cranes, forklifts, mobile plant, emergency vehicles and/or livestock.</p> <p>c) The TMP generally includes reference to the traffic related conditions in the project approval.</p> <p>d) The Drivers Code of Conduct is outlined in Section 6.1. It covers speed limits (Section 6.1e) (40km/h on the construction site and 15km/h on the site compound) and various management measures which aim to implement safe driving practices i.e. use of seatbelts, prohibition of mobile phone use, licencing requirements etc. the Driver Code of Conduct does not specifically refer to heavy or over-dimensional vehicle routes however it does state that vehicles must keep on the designated site roads where established and that off road driving is not permitted (Section 6.1(d)). The Drivers code of conduct does not detail specific procedures to ensure that drivers implement safe driving practices, particularly if using roads through Broken Hill or Silverton; however Section 6.1(g) does require all drivers to abide by the rules and regulations in place on public roads leading to the project site. The Drivers Code of Conduct does not address monitoring and reporting</p>	<p>Not Verified</p> <p>2018 IEA REC 05 Ensure the TMP has been updated to document the outcomes of the actions identified by the DPE in its approval of the Plan.</p>

Reference	Condition	Comments	Audit Finding
		<p>on the effectiveness and the code of conduct. Section 9.0 details the monitoring requirements of the TMP however this is not under the Drivers Code of Conduct.</p> <p>The Revision History table in the front of the document indicates that the TMP was updated on four occasions to incorporate RMS and Silverton Council comments, the latest being Rev 4 dated 07.08.17. A letter from RMS was sighted dated 24.08.17 advising that the TMP Rev 4 was accepted by RMS subject to two implementation conditions.</p> <p>An email was sighted providing the TMP Rev 4 to the DPE on the 24.08.17 and an acknowledgment email that it was received by the DPE sighted dated 25.08.17.</p> <p>Whilst the TMP indicated it was updated to reflect RMS comments, it was not clear whether the DPE's approval conditions had been addressed and whether the updated TMP documented the outcomes of the required actions. This was not obvious based on a brief review of the TMP and on this basis this condition has been assessed as not verified.</p> <p><u>Implementation</u></p> <p>It is considered that the commitments and obligations outlined in the TMP were generally being implemented. In summary the following is noted:</p> <ul style="list-style-type: none"> • CCC meetings were used to inform community of project related traffic impacts. In addition AGL emailed CCC members on 9 June 2017 to notify them of the TMP and ask for consideration of the plan and feedback where required. • The Drivers Code of Conduct was provided to the transport sub-contractor, Ares Transport Group (Ares), for review and acknowledgement. In addition the auditor's sighted the sub-contractor agreement which states that all works were to be completed in accordance with the requirements of Heavy vehicle National Law Act, the TMP and GE-CATCONs procedures. The auditors sighted reports on Heavy Vehicle National Legislation Compliance Reviews of Road Transport Providers (reports dated 20.04.2018 and 22.12.2017). These audits were conducted by Jacob Reed Australia Pty Ltd against Ares to verify compliance with the National Heavy Vehicle Legislation. Ares provided transport services including movement of oversize and over-dimensional freight from Port Adelaide to Silverton Windfarm. GE-CATCON engaged Engistics to conduct a review of the first oversize load movements conducted on Monday 27.11.17 and again to conduct a random review of oversized movements conducted in November 2017 and 11.04.17. The reports dated 19.12.17 and 12.04.18 detail a review of the vehicle movements and lifting operations. The reviews included an assessment of competencies of contractors, permits and lifting/loading operations. The reports identified a number of issues associated with safety culture of drivers and load restraint techniques. These were reported to GE-CATCON for actioning. • The TMP includes reference to GE-CATCON as the primary contact for community complaints during construction. Although a complaints procedure was in place no complaints had been received at the time of the audit. • GE-CATCON procedure SPS-10 Accidents and Incidents is required to be followed for any incidents that may occur. No incidents had been reported at the time of the audit. <p><u>Connection Works</u></p> <p><u>Preparation</u></p> <p>NHG developed the Construction Transport Management Plan (CTAMP) on behalf of TransGrid. The CTAMP was submitted to DPE for approval on 25.05.17 and was conditionally approved on 22.06.17. TransGrid then submitted a revised copy of the CTAMP to DPE on 09.11.17. The CTAMP was formally approved by DPE on 10.11.17.</p> <p>The CTAMP includes the following:</p> <ol style="list-style-type: none"> a) Section 7 of the CTAMP includes reference to the environmental requirements and control measures to address traffic and transport impacts associated with the connection works. b) TransGrid reported that no travelling stock routes crossed the transmission line. c) The CTAMP references traffic related conditions from the project approval and details managed measures in Section 7. d) Section 6.1 of the CTAMP states that specific traffic control plans (TCPs) will be prepared prior to works which could impact public roads and traffic. The TCPs will include a driver's code of conduct which will include the requirements of Condition 27(d), Schedule 3. The auditors did not sight any TCPs and as such were unable to verify the driver's code of conduct was included and inclusive of the requirements specified in Condition 27(d), 	

Reference	Condition	Comments	Audit Finding
		<p>Schedule 3.</p> <p><u>Implementation</u></p> <ul style="list-style-type: none"> The TransGrid induction package includes reference to driver conduct and on site traffic requirements. Induction records and sign off sheets were sighted by the auditors. Speed limits enforced and referenced in environmental inspection records i.e. 10km/h at BKH, 40km/h on the GE-CATCON road and 20km/h at the GE-CATCON site and SVT. The community was informed of transport movements via the CCC meetings, as verified through review of CCC meeting minutes. Heavy vehicle and over-dimensional vehicle movements were conducted in accordance with the CTMP. Oversize/Overmass heavy vehicle/wide load permits approved by Broken Hill City Council were sighted by the auditors. The independent environmental representative appointed by TransGrid reported that no incidents or complaints were received during the connection works with relation to traffic movements. 	
AVIATION			
SH3COA28	<p>Notification of Aviation Authorities: Prior to the construction of any wind turbine or wind monitoring mast, the Proponent must provide the following information to CASA, Airservices Australia, Broken Hill City Council and the RAAF (together the authorities):</p> <p>(a) coordinates in latitude and longitude of each wind turbine and mast;</p> <p>(b) final height of each wind turbine and mast in Australian Height Datum; and</p> <p>(c) ground level at the base of each wind turbine and mast in Australian Height Datum.</p>	<p>Notification was sent to Broken Hill City Council, Airservices Australia, CASA and the Department of Defence by Silverton Project Coordinator (by email dated 27.04.17). The email included:</p> <ul style="list-style-type: none"> Coordinates of each wind turbine AHD of ground level of the structures and elevation levels with 175m top of blade height Corresponding 3D shapefiles of the above. 	Compliant
SH3COA29	<p>Notification of Aviation Authorities: Within 30 days of the practical completion of any turbine or mast, the Proponent must:</p> <p>(a) provide confirmation to the authorities that the information that was previously provided remains accurate; or</p> <p>(b) update the information previously provided.</p>	Not triggered at the time of the audit as no turbine or mast had reached practical completion.	Not Triggered
RADIO COMMUNICATIONS			
SH3COA30	<p>Prior to the commencement of construction, the Proponent must undertake a baseline assessment of radio communication services to assess the pre-existing signal strength at any residence within 5 kilometres of the site, in consultation with registered communications licence holders (including emergency services).</p> <p>If this assessment identifies the potential for interference as a result of the project, the Proponent must identify and implement reasonable and feasible mitigation measures to address any potential disruption in consultation with the landowner (where applicable). These measures must be implemented within 3 months of the completion of the baseline assessment, or as otherwise agreed by the Secretary.</p>	<p>A baseline assessment of radio communication services was completed by Lawrence Derrick & Associates prior to the commencement of construction (report dated 4 May 2017).</p> <p>The report states that the objective of the study was to confirm the clearance requirements for the radio services in the area to allow the wind farm layout to be confirmed or modified so that there will be no detrimental effects on the performance of the existing services. It was not clear that the registered communications licence holders were consulted. The report made a number of recommendations relating to clearances, micro-siting and consultation with operators (Essential Energy, NSW RFS and the NSW Government Telecommunications Authority). It was not clear whether these recommendations had been addressed and on this basis, this condition could not be verified.</p>	<p>Not Verified</p> <p>2018 IEA REC 06</p> <p>Ensure the recommendations within the baseline assessment of radio communication services are implemented.</p>
SH3COA31	<p>If the project disrupts any radio communications services in the area, then the Proponent must make good any disruption to these services as soon as possible following the disruption of the services, but no later than 1 month following the disruption, unless the relevant service providers or user or Secretary agrees otherwise. If there is a dispute about the mitigation measures to be implemented or the implementation of these mitigation measures, then either party may refer the matter to the Secretary for resolution. The Secretary's decision on such a referral will be final and binding on all parties.</p>	It was reported that disruptions to radio communication services will not be known until the windfarm is fully operational. On this basis, this condition is considered 'not triggered'.	Not Triggered
BUSHFIRE			

Reference	Condition	Comments	Audit Finding
SH3COA32	The Proponent must: (a) ensure that the project: • provides for asset protection in accordance with the RFS's Planning for Bushfire Protection 2006 (or its latest version); • is suitably equipped to respond to any fires on site; (b) develop procedures to manage potential fires on site, in consultation with the RFS; and (c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site.	<p>Wind Farm Works</p> <p>a) GE-CATCON requested on 19.06.2017 a Bushfire Consultants Report from NSW Rural Fire Service. GE-CATCON reported to NSW Rural Fire Services that they hold the following resources to assist with response to incidents on site:</p> <ul style="list-style-type: none"> • 2 x Water Trucks at 40.000 litres, fed by Site Compound Stand Pipe, • 1 x Water Pony (Trailer) with pump and hose, • All light vehicles and mobile plant carry fire extinguishers <p>NSW Rural Fire Services provided GE-CATCON with the Silverton Wind Farm District Pre-Incident Plan (V1.0 October 2017). The plan includes a list of firefighting resources and equipment, facilities on and offsite, response strategies and environmental risk considerations.</p> <p>b) The GE-CATCON Emergency Response Plan (Dec 2016) details an emergency flow chart to be utilised in the event of a bushfire. In addition, the Health and Safety Management Plan (November 2017) details requirements for fire safety equipment and response procedures in the event of a fire on site. It is not clear whether RFS was consulted on the development of the plan however as stated above, RFS was input was obtained in the form of the Silverton Wind Farm District Pre-Incident Plan. The GE-CATCON Emergency Response Plan could be improved by referencing this plan.</p> <p>Induction records sighted indicated emergency procedures were communicated to workers and visitors to site.</p> <p>d) At the time of the audit the auditors were informed by the site that it was not aware of any fires having occurred at the site since commencement of construction.</p> <p>It is noted that the auditors are not fire safety experts and as such are not suitably qualified to fully assess compliance with this condition or if the site is suitably equipped to respond to fires on site.</p> <p>Connection Works</p> <p>TransGrid Fire Risk Procedure details the requirements for minimum fire equipment and working during high fire danger periods.</p> <p>TransGrid reported that no fire emergencies occurred during Connection Works.</p> <p>It is noted that the auditors are not specialists in fire management and hence are not able to fully assess compliance with this condition.</p>	<p>Compliant</p> <p>2018 IEA OFI 20 The site emergency response plan could include reference to the Silverton Wind Farm District Pre-Incident Plan prepared by NSW Rural Fire Services.</p>
SAFETY			
SH3COA33	The Proponent must: (a) prepare a Safety Management System for the project in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management' prior to commissioning any wind turbines on site; and (b) implement, and if necessary update, the system over the remaining life of the project.	<p>CATCON prepared an HSE Management System which integrates quality, safety and environmental functions. Section 2.0 of the system description states that the Safety Management System was developed in accordance with the DPEs hazardous industry planning advisory paper no.9 – safety management. It is noted the Management System was also reviewed against the Planning Advisory Paper by Jacob's safety representative.</p> <p>As the auditors are not safety experts, the implementation of the safety management system has not been assessed.</p>	Not assessed
WASTE			
SH3COA34	The Proponent must: (a) minimise the waste generated by the project; (b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines, 2014 (or its latest version); (c) store and handle all waste generated on site in accordance with its classification; (d) not receive or dispose of any waste on site; and (e) ensure all waste is disposed of at appropriately licenced waste facilities.	<p>Wind Farm Works</p> <p>a) General site waste is collected on site and taken to the Broken Hill City Council Landfill Depot. Induction records sighted by the auditors included reference to waste management. The GE-CATCON CEMP contains a specific objective to "minimise waste generated during construction". Specific management measures were monitored during the weekly and monthly compliance inspections conducted by the CATCON HSE Advisor and Jacobs. Jacobs inspections reported examples of waste reuse on site such as re-use of bases of oversized wooden crates as waste bins for wood waste from turbine packaging.</p> <p>b) The site manages multiple Waste Tracking Registers (viewed by auditors) which include:</p> <ul style="list-style-type: none"> • Construction waste register • General waste register • Hydrocarbon waste register • Wastewater register <p>c) Evidence of waste segregation was observed during the audit site inspection such as</p>	Compliant

Reference	Condition	Comments	Audit Finding																		
		<p>collection of steel wastes.</p> <p>d) The auditors were informed that no waste is received on site. The only items brought onto site are sand and gravel used for concrete.</p> <p>e) The majority of waste is classified as general waste and is taken to Broken Hill City Council Landfill Depot. Chemical waste will also go to Broken Hill City Council Landfill Depot.</p> <p>Connection Works</p> <p>CPP maintained a waste management and minimisation assessment form (dated 02.11.2017). The document lists all waste types coming to site and also:</p> <ul style="list-style-type: none">• Classifies it in accordance with EPA waste classification guidelines.• Determines on-site segregation and storage• Determines transport and disposal methods.• Establishes record requirements for each item of waste. <p>NJ Constructions maintained a waste register for the connection works. This register was sighted by the auditors and included only general waste items which were disposed of at Broken Hill City Council Landfill Depot. In addition CPP, on behalf of TransGrid, also maintained a waste register. This register was sighted by the auditors and included septic, timber and general waste. All waste was disposed of a Broken Hill City Council Landfill Depot.</p> <p>TransGrid reported that waste metal was recycled at the recycling facility on Pinnacles Road, Broken Hill.</p> <p>Environmental Inspection reports reviewed waste management practices and also reported on any hydrocarbon spills which may require collection and disposal. The auditors sighted waste disposal records and fees for contaminated waste from an oil spill onsite. This waste was disposed of at Broken Hill City Council landfill Depot on 6.12.2017.</p> <p>NJ Constructions induction package includes waste management as a topic.</p>																			
REHABILITATION & DECOMISSIONING																					
SH3COA35	<p>Rehabilitation Objectives: Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Proponent must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the objectives in Table 4.</p> <p><i>Table 4: Rehabilitation Objectives</i></p> <table><tr><th>Feature</th><th>Objective</th></tr><tr><td>Project site (as a whole)</td><td><ul style="list-style-type: none">• Safe, stable and non-polluting• Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use as far as is reasonable and feasible</td></tr><tr><td>Revegetation</td><td><ul style="list-style-type: none">• Restore native vegetation generally as identified in the Biodiversity Management Plan• To be decommissioned and removed, unless the Secretary agrees otherwise</td></tr><tr><td>Above ground wind turbine infrastructure (excluding wind turbine pads)</td><td></td></tr><tr><td>Wind turbine pads</td><td><ul style="list-style-type: none">• To be covered with soil and/or rock and revegetated</td></tr><tr><td>Above ground ancillary infrastructure</td><td><ul style="list-style-type: none">• To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary</td></tr><tr><td>Internal access roads</td><td><ul style="list-style-type: none">• To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary</td></tr><tr><td>Land use</td><td><ul style="list-style-type: none">• Restore or maintain land capability as described in the EA</td></tr><tr><td>Community</td><td><ul style="list-style-type: none">• Ensure public safety</td></tr></table>	Feature	Objective	Project site (as a whole)	<ul style="list-style-type: none">• Safe, stable and non-polluting• Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use as far as is reasonable and feasible	Revegetation	<ul style="list-style-type: none">• Restore native vegetation generally as identified in the Biodiversity Management Plan• To be decommissioned and removed, unless the Secretary agrees otherwise	Above ground wind turbine infrastructure (excluding wind turbine pads)		Wind turbine pads	<ul style="list-style-type: none">• To be covered with soil and/or rock and revegetated	Above ground ancillary infrastructure	<ul style="list-style-type: none">• To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary	Internal access roads	<ul style="list-style-type: none">• To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary	Land use	<ul style="list-style-type: none">• Restore or maintain land capability as described in the EA	Community	<ul style="list-style-type: none">• Ensure public safety	Cessation of operations has not occurred.	Not Triggered
Feature	Objective																				
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Community	<ul style="list-style-type: none">• Ensure public safety																				
SH3COA36	<p>Progressive Rehabilitation: The Proponent must</p> <p>(a) rehabilitate all areas of the site not proposed for future disturbance progressively, that is, as soon as reasonably practicable following construction or decommissioning;</p> <p>(b) minimise the total area exposed at any time; and</p> <p>(c) employ interim rehabilitation strategies to minimise dust generation, soil erosion and weed incursion on parts of the site that cannot yet be permanently rehabilitated.</p>	<p>Wind Farm Works</p> <p>Rehabilitation is discussed in the DPE approved Biodiversity Management Plan (windfarm works) required under condition 18 includes details on rehabilitating and revegetating disturbance areas (section 5.4). It also details that a Vegetation Management Plan (VMP) for restoring vegetation and habitat in the temporary disturbance areas will be developed and approved prior to the wind farm being operational (section 9). The operational VMP was with DPE for approval at the time of the audit. Given it was not a final report at the time of the audit was not assessed as part of this audit.</p> <p>GE Catcon's Sub-Plan 11 of the Construction Environmental Management Plan (CEMP), as referenced in the BMP also provides detail on management practices to be applied in rehabilitation of disturbed areas. However, as discussed in the adequacy of the BMP (Table 6-1 of the main report), it was not clear as to what standard or criteria the sites are to be rehabilitated to; how rehabilitation would be signed off as being adequate or sufficient; what monitoring would be</p>	<p>Windfarm Works</p> <p>a) Not Verified</p> <p>c) Non compliant</p> <p>Connection Works Compliant</p> <p>Recommendations relate to Wind Farm Works only)</p> <p>2018 IEA REC 07</p> <p>Employ interim rehabilitation</p>																		

Reference	Condition	Comments	Audit Finding
		<p>undertaken to assess rehabilitation success or when rehabilitation would be completed.</p> <p>The following observations were made during site inspections:</p> <ul style="list-style-type: none"> Up to the date of the site inspection the focus of CATCON appeared to have been on construction, with relatively limited rehabilitation efforts observed. Some rehabilitation was observed in the vicinity of the Substation where former laydown areas had been contoured and lightly ripped; some drainage lines had been lined with large gravel; and further contouring was ongoing. Rehabilitation was reported to have occurred at Tower 50. Other areas may have been rehabilitated, such as cable runs in Area 4, however the extent of rehabilitation was not clear from documents and discussions during the site visit. A number of cable runs and access roads did not appear to “<i>employ interim rehabilitation strategies to minimise soil erosion</i>”. Specifically, a number of steep cable runs were sighted with limited if any ERSER controls. Various access roads in steep ground were also noted to not have adequate ERSER controls. CATCON indicated that their approach would be to monitor weather forecasts and employ controls when rain was predicted. The extent of the disturbed areas in access roads and cable runs was significant and auditors considered that there may not be sufficient time to employ adequate controls in this period. Notwithstanding this, it is acknowledged that there has been well below average rainfall since construction commenced, and erosion and significant erosion and sedimentation impacts were not sighted. There were limited documents available for review that described key aspects of rehabilitation approaches such as: to what standard or criteria the sites are to be rehabilitated to; how rehabilitation would be signed off as being sufficient; or when rehabilitation would be completed. It was unclear if the topsoils (containing the seed bank which is important in successful rehabilitation) had been separated, salvaged and stored during clearing works for later spreading over rehabilitated surfaces to promote revegetation. A number of signs were sighted indicated that “Rehabilitation Planning” was underway and to keep of these areas. <p>CATCON reported in August 2018 the following in respect of rehabilitation: “<i>As a general rule, rehabilitation of road verges and hardstand batters is progressive and subject to whether or not the turbines have been erected and fully commissioned.</i>”</p> <p><i>As a general rule, rehabilitation along underground cable routes can only commence once the installed cable has been connected, tested and energised.</i></p> <p><i>As general rule, the priority given to rehabilitation methods is (1) natural regeneration which relies on the germination of dormant native seeds within soils and on the ground surface (2) the application of scarified native seed in sensitive or potentially erodible areas (3) the installation of native vegetation tube stock with the two year defects liability period, should natural regeneration or the application of scarified seed fail to stabilise and bind the disturbance ground surface. As a general rule, rehabilitation is ongoing and will apply to the operational life of the wind farm.”</i></p> <p>Rehabilitation had only recently commenced at the time of the audit and as such limited progressive rehabilitation was visible to the auditors. Given there was no defining of the timing of progressive rehabilitation, part a) is considered Not Verified.</p> <p>Very limited interim rehabilitation strategies to minimise soil erosion were sighted. On this basis, part c) of this condition has been assessed as non-compliant. Further discussion of rehabilitation performance as observed during the site visit is provided in Table 5-4 of the main report. Recommendations from this table are included here.</p> <p><u>Connection Works</u></p> <p>The auditors reviewed the inspection reports from the Urban Perspectives inspections conducted of the connection works. Environmental inspection reports require rehabilitation progress to be reviewed. As reported in the environmental inspection reports rehabilitation included landscaping, respreading of any topsoil, limiting the size of any runoff areas, and light ripping.</p> <p>TransGrid reported in an email provided on 15 August 2018 that “<i>At all sites along the connection work, the topsoil, containing seed material was stripped and stockpiled within the construction</i></p>	<p>strategies as required of SH3COA36 to minimise soil erosion where permanent controls cannot be immediately completed. Specifically high risk areas e.g. steep cable runs and access roads in steep areas or in Area 7 should be prioritised.</p> <p>2018 IEA REC 08 Develop a documented approach with input from suitable experts for the ongoing rehabilitation of the site. This should define rehabilitation criteria over time; what would be done if rehabilitation fails; methods for signing off when rehabilitation has reached agreed rehabilitation criteria; and define progressive rehabilitation approaches. It is noted that the Draft Vegetation Management Plan addresses some aspects of the recommendation.</p> <p>2018 IEA REC 09 Large cleared and disturbed areas be provided with improved ERSER controls and rehabilitated progressively. This applies to laydown areas no longer required for construction; and the crusher area. Checks using rock would provide a longer term control and would likely be more effective.</p>

Reference	Condition	Comments	Audit Finding
		<p>envelope. As works were being completed, the topsoil material was respread over the site as much as possible. All sites were lightly ripped and any other stockpiles, windrows, steep sections etc were landscaped or removed as required. All sites comply with the intent of the BMP. This has provided stability and a seedbank and conditions to allow natural recruitment to occur.”</p> <p>The environmental inspector did make note of the dry and sparse conditions present along majority of the transmission line, and as such this made rehabilitation difficult.</p> <p>Based on the site inspection and discussion above, the Connection Works were considered to be generally compliant with this condition.</p> <p>Given the timing of the site inspection and dry conditions noted, there was little or no revegetation established. Compliance with this condition will have to be continually assessed over time to ensure rehabilitation is successful. TransGrid has stated the following in regards to Ongoing rehabilitation approach and monitoring:</p> <p>“Monitoring will occur by the ESR (or delegate) approximately biannually for at least 2 years. The main objectives for rehabilitation of the connection works will be to monitor site stability, revegetation/recovery, and weed encroachment.</p> <p>Site stability – All sites along the connection works to be monitored for active erosion. Where erosion is observed (such as rilling) and considered likely to continue and hamper rehabilitation, it shall be addressed.</p> <p>The main risk to erosion along the transmission line will be run-on water from long bare slopes above the site. This issue is addressed by construction small diversion bank/swale directly above the site.</p> <p>Signs of recovery (vegetation) - All sites along the connection works will be monitored for vegetative recovery. This will include observations where seedlings/resprouting is occurring. Several formal monitoring sites within different vegetation communities to be identified to assess against benchmarks. Note that the land adjacent to the sites may be used as a benchmark if they differ from the BMP benchmarks.</p> <p>The aim for rehabilitation over the monitoring period is to ensure that the rehabilitation sites are progressing towards the benchmark conditions.</p> <p>If, after the monitoring period the rehabilitation has substantially failed, i.e. not progressing toward the benchmark conditions, and there is potential for environmental impact, further rehabilitation measures need to be considered.</p> <p>Weed infestation – Monitoring of each site, access track, and water crossings will be undertaken to identify if the project works have caused any potential weed issue, including spreading of existing weeds, or introduction of new weeds.</p> <p>A short report will be produced documenting the results of each inspection.”</p> <p>The Connection Works are considered compliant with this condition given that rehabilitation was generally complete.</p>	<p>2018 IEA OFI 21</p> <p>Ensure adequate weed monitoring is conducted after rain events. Suitable controls should be in place to controls weeds identified. It is noted that the Vegetation Management Plan describes an approach to weed management and hence addresses some aspects of this OFI.</p>
SH3COA37	Dismantling of Wind Turbines: Any individual wind turbines which cease operating for more than 12 consecutive months must be dismantled within 18 months after that 12 month period, unless the Secretary agrees otherwise.	This had not occurred at the time of the audit.	Not Triggered
ENVIRONMENTAL MANAGEMENT			

Reference	Condition	Comments	Audit Finding
SH4COA1	<p>Environmental Management Strategy: Prior to the commencement of construction, the Proponent must prepare an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must:</p> <p>(a) provide the strategic framework for environmental management of the project;</p> <p>(b) identify the statutory approvals that apply to the project;</p> <p>(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;</p> <p>(d) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise; • respond to any non-compliance; • respond to emergencies; and <p>(e) include:</p> <ul style="list-style-type: none"> • copies of any strategies, plans and programs approved under the conditions of this approval; and • a clear plan depicting all the monitoring to be carried out in relation to the project, including a table summarising all the monitoring and reporting obligations under the conditions of this approval. <p>Following the Secretary's approval, the Proponent must implement the Environmental Management Strategy.</p>	<p>AGL has in place an Overarching Environmental Management Strategy (OEMS, Doc No. STWF_NP_PLN_OEMS, 5 May 2017) for the Silverton Wind Farm Project. The Overarching EMS outlines that the Silverton Wind Farm is planned to be delivered under two scopes of work, that being the Wind Farm Works (inclusive of construction and operation) and the Connection Works. As a result the project operates separate EMS' inclusive of the following:</p> <ul style="list-style-type: none"> • The Wind Farm Works Environmental Management Strategy (WEMS) i.e. construction EMS; • The Operational EMS (OpEMS); and, • The Connection Works EMS (TransGrid) <p>Wind Farm Works</p> <p><u>WEMS Preparation</u></p> <p>EHP developed the WEMS on behalf of GE-CATCON. This WEMS includes environmental management measures for the works phase, specifically managing aspects relating to the engineering, procurement and construction of the wind farm which was expected to be conducted between May 2017 and July 2018. GE-CATCON received initial approval for the WEMS on the 05 May 2017 which was prior to the commencement of construction on the 11 May 2017. The initial version of the WEMS did not cover Area 7, which included wind turbines T28 and T35, underground and overhead electricity transmission lines and internal roads in the Porcupine Grass Sparse Woodland.</p> <p>In December 2017, DPE approved commencement of construction in Area 7 and confirmed that construction in Area 7 would be done in accordance with the approved Biodiversity Management Plan (refer details provided against Condition 18, Schedule 3). On 12 March 2018 DPE approved the revised WEMS which included reference to the works conducted in Area 7.</p> <p>a) Section 2 of the WEMS includes the strategic framework for the works. Engineering, procurement and construction of the wind farm works are managed in by the WEMS and CEMP. Specific environmental matters will be managed by the environmental sub plans which fall under the WEMS and CEMP.</p> <p>b) Section 3 of the WEMS outlines the statutory approvals for the project and includes reference to the Project Approval (MOD 3) and Environmental Protection Licence (EPL No. 20882).</p> <p>c) Section 4 of the WEMS details responsibility and accountabilities for key personnel. Table 1 in Section 4 outlines specifically the role, responsibility, authority and accountability of the Consortium Project Manager, Site Construction manager, QSE Manager, HSE Advisor (construction), HSE Manager (Electrical), Environmental Consultant, Turbine Supplier EHS Manager and Ecologist (Biosis – Area 7).</p> <p>d) The WEMS includes reference to the following with regards to the requirements of condition 1(d) of Schedule 4:</p> <ul style="list-style-type: none"> • Section 5 of the WEMS details measures for keeping the local community informed. This includes an outline of the mechanisms which will inform the community such as the CCC meetings, the project website and the public register for the sites EPL. • Section 6 of the WEMS details management measures with relation to pollution complaints. The WEMS reports that complaints relating to pollution will be directed to a 1300 number or Silverton email address. Complaints are handled by the Site Construction manager and will be recorded in a complaints register which will be publically available on the project website. • Section 7 of the WEMS references disputes. Disputes with a member of the public will be dealt with in the same manner as a pollution complaint with investigations being conducted as required. Any matters that cannot be resolved will be referred to the DPE for advice and resolution. • Section 8 of the WEMS references non-compliances. Specifically section 8.1 details the process of dealing with non-compliances with project approval 	Compliant

Reference	Condition	Comments	Audit Finding
		<p>conditions, Section 8.2 details the process of dealing with non-compliances with the project EPL and Section 8.3 details the process of dealing with a non-compliance with any of the site management plans. Where a non-compliance arises that is not in relation to a regulatory requirements this will be recorded in an improvements register.</p> <ul style="list-style-type: none"> Section 9 of the WEMS references emergencies and details that immediate notification to the DPE and relevant agencies will occur of any incident or near miss where material harm to the environment has occurred or is at risk. The WEMS refers to the Silverton Wind Farm Emergency Response Plan and Pollution Incident Response Plan for details about responding to emergencies. <p>e) Section 10 of the WEMS refers to related strategies and plans. The WEMS states that it should be read in conjunction with the documents that are authorised under the conditions of the project approval (mod 3), applicable to construction. This includes final layout plans, Biodiversity management plan, barrier range dragon management plan, heritage management plan, road upgrade and maintenance strategy and the traffic management plan.</p> <p>Section 11 of the WEMS details monitoring and reporting obligations to be carried out. Table 2 and 3 of the WEMS outline a summary of the obligations derived from Schedules 2 and 3 of the project approval. In addition Table 4 of the WEMS provides the monitoring and reporting aspects associated with the project EPL. All monitoring and reporting conditions relevant to construction activities in Area 7 are summarised in Table 5 of the WEMS.</p> <p><u>OpEMS Preparation</u></p> <p>In June 2017 EHP commenced development of an operational EMS (OpEMS) which follows on from the Overarching EMS. The OpEMS follows the same format of the WEMS however covers the operational aspects, specifically the servicing and maintenance of the wind farm. The OpEMS states that the plan will be implemented from March 2018 (when testing and commissioning of the wind turbines is expected to begin).</p> <p>The OpEMS was submitted to the DPE for approval on 20 July 2017. Following consultation with the DPE a revised version of the OpEMS was reviewed and approved on the 21 December 2017.</p> <p>a) Section 2 of the OpEMS includes the strategic framework for the operations. Operation of the wind farm is to be managed by the OpEMS and OEMP. Specific environmental matters will be managed by the environmental sub plans required by the project approval.</p> <p>b) Section 3 of the OpEMS outlines the statutory approvals for the project and includes reference to the Project Approval (MOD 3) and Environmental Protection Licence (EPL No. 20882). Section 3.1.1 summarises the recommendations from the DPE in the Project Approval Mod 3.</p> <p>c) Section 4 of the OpEMS details responsibility and accountabilities for key personnel. Table 2 in Section 4 outlines specifically the role, responsibility, authority and accountability of the Site Manager, Site EHS Coordinator, EHS Leader GE Renewables ANZ and Site Supervisor.</p> <p>d) The OpEMS includes reference to the following with regards to the requirements of condition 1(d) of Schedule 4:</p> <ul style="list-style-type: none"> Section 5 of the OpEMS details measures for keeping the local community informed. This includes an outline of the mechanisms which will inform the community such as the CCC meetings, the project website and the public register for the sites EPL. Section 6 of the WEMS details management measures with relation to pollution complaints. The WEMS reports that complaints relating to pollution will be directed to an 1800 number or AGL Community email address. Complaints are handled by AGL and will be recorded in a complaints register which will be publically available on the project website. Section 7 of the OpEMS references disputes. Disputes with a member of the public will be dealt with in the same manner as a pollution complaint with 	

Reference	Condition	Comments	Audit Finding
		<p>investigations being conducted by AGL. Any matters that cannot be resolved will be referred to the National Wind Farm Commissioner for advice and resolution.</p> <ul style="list-style-type: none"> Section 8 of the OpEMS references non-compliances. Specifically section 8.1 details the process of dealing with non-compliances with project approval conditions, Section 8.2 details the process of dealing with non-compliances with the project EPL and Section 8.3 details the process of dealing with a non-compliance with any of the site management plans. Section 8.4 details that any other notable events and subsequent incidents that are not non-compliances will be reported in their annual report to the EPA and DPE. Section 9 of the OpEMS references emergencies and details that immediate notification to relevant agencies will occur of any incident or near miss where material harm to the environment has occurred or is at risk. The OpEMS refers the reader to the Silverton Wind Farm Operations Emergency Management Plan and Pollution Incident Response Plan for details about responding to emergencies. <p>e) Section 10 of the OpEMS refers to related strategies and plans. The OpEMS states that the plan should be read in conjunction with the documents that are authorised under the conditions of the project approval (mod 3), applicable to operations. This includes Biodiversity Management Plan and sub plans and the Heritage Management Plan.</p> <p>Section 11 of the OpEMS details monitoring and reporting obligations to be carried out. The OpEMS provides a summaries of the monitoring and reporting obligations associated with the Approval (schedules 2 and 3) and EPL.</p> <p><u>Implementation of WEMS and OpEMS</u></p> <p>All monitoring required in Section 11 of the WEMS had been triggered at the time of the IEA site inspection (June 2018). Monitoring requirements triggered for the OpEMS included the Monitoring of bird and bat strikes only. As operations had not commenced at the time of the audit majority of the monitoring requirements specified in the OpEMS were not triggered. Given that the site was not fully operational at the time of the audit a thorough assessment of the implementation of all aspects of the OpEMS was not able to be undertaken.</p> <p>The WEMS and OpEMS, where triggered, were considered to have been generally implemented on site. This included:</p> <ul style="list-style-type: none"> An internal monitoring and review program was implemented during construction as is required by both the WEMS and the OpEMS. This program included weekly inspections of the works by GE-CATCON, monthly inspections by an independent consultant (required by the WEMS) and three monthly inspections conducted by the site manager or EHS Coordinator. At the time of the audit the following routine inspections were being undertaken: <ul style="list-style-type: none"> Monthly environmental inspections by GE-CATCON Environmental Advisor (EHP). Inspection reports from June, September, November and December 2017 and January and May 2018 were sighted by the auditors. The EHP inspections reports were noted to include a review of the waste register and waste storage, erosion and sediment controls, stockpile management, temporary laydown areas and processing pads, heritage fencing and general water management. Bi-monthly environmental inspections were being undertaken by Jacobs and attended by CATCON representatives. Monthly reports from May 2017, October 2017 and January 2018 were sighted by the auditors. The inspection reports included photographs of corrective items raised and of discussion items / site observations. Actions raised during the inspections were entered into an Environmental Actions Register and close out of actions tracked by Jacobs. The reports were noted to review management measures implemented as required by management plans, housekeeping standards, storage of hydrocarbons and chemicals, oil leaks, uncontained spills, spill kits, waste segregation and erosion and sediment control. Weekly inspections by GE-CATCON's Health Safety and Environment (HSE) Manager (Jacobs). The weekly HSE inspections were attended by the GE HSE Manager and were reported in the weekly update report which included results from 	

Reference	Condition	Comments	Audit Finding
		<p>the inspection as well as an update on project progress.</p> <ul style="list-style-type: none"> A visitor and contractor induction process was in place and followed, as verified by review of a sample of induction records. CCC and website meetings have been held every 2 months since April 2016. Minutes of the CCC meetings as well as the presentation provided to the CCC were available on the AGL Silverton Public Website. AGL have implemented a complaints management process. No environmental related complaints had been recorded or reported to have been received by AGL or CATCON. CATCON's Hazard and Incident Register was reviewed by the auditors. No incidents which caused or threatened to cause material harm to the environment were recorded during wind farm works. This was also supported by site interviews. No observations during the site inspection indicated incidents having had occurred that would trigger report under the condition. <p><u>Connection Works</u></p> <p><i>Preparation</i></p> <p>The Connection Works EMS was developed by TransGrid and was approved by DPE on 31 May 2017. As per the notification of intended dates letter sent to DPE by TransGrid on 24.05.17, mobilisation to Broken Hill Substation commenced on 07.06.17. The TransGrid EMS was prepared only for the construction component of the project and states that it will be updated to incorporate the operational aspects of the connection infrastructure following construction.</p> <ol style="list-style-type: none"> Section 1.2 of the EMS details the EMS Framework. Which outlines the overall strategic framework for environmental management in delivering TransGrids scope for construction of the works at Silverton Wind Farm. Environmental Management is to be managed under the EMS, the CEMP and environmental management plans and sub plans as well as the contractor checklists, procedures and records. TransGrid have developed the EMS in accordance with ISO 14001 and as such provide the EMS Environmental Policy in Appendix 2 of the EMS. Section 2 of the EMS is titled 'Planning' and outlines the legislative and other environmental management requirements as well as the environmental objectives and targets. Appendix A1 of the EMS includes a register of legal and other requirements for the project. Section 2.3 outlines the requirements of Condition 4, Schedule 1 and where each requirement is addressed in the EMS. Section 4.1 'Structure and Responsibility' outlines a table containing the project construction team roles, responsibilities, authorities and accountabilities. This includes the Works delivery project manager, Environmental Manager, Works Delivery Site Construction Coordinator, ESR (TransGrid Environmental Officer), as well as all TransGrid staff and Contractors. The EMS includes: <ul style="list-style-type: none"> Section 4.4 of the EMS details internal and external communication measures The EMS does not clearly describe the procedures that would be implemented to receive, handle, respond to and record complaints. It is outlined in Section 4.4.2 of the EMS that AGL will be responsible for community enhancement, CCC meetings and the project website. This section also states that AGL's community relations manager for the Silverton Wind Farm will coordinate with the TransGrid Environmental Site Representative (ESR) if any external concerns arise. Table 2-2 also outlines that "Phone and e-mail details are available on the project website". The EMS states that AGL will liaise directly with TransGrid in relation to resolution of issues. Section 4.4.2 states that the ESR (TransGrid) will be the main point of contact regarding specific environmental issues. Where required TransGrid would provide written information to AGL for reporting environmental performance to the DPE. Section 5.3 outlines Non-compliance and corrective and preventative actions and outlines that environmental non-compliances will be dealt with through the incident management procedures outlined in Section 4.7. Section 4.7 outlines the emergency preparedness and response measures. 	

Reference	Condition	Comments	Audit Finding
		<p>Appendix A3 includes TransGrid's standard Environmental Incident Response Procedure.</p> <p>e) Environmental plans prepared as part of the EMS are detailed in section 4.2. Section 5.2 outlines all monitoring to be carried out in relation to the project. This includes a table summarising all monitoring and reporting obligations.</p> <p><u>Implementation</u></p> <p>The TransGrid EMS was considered to have been generally implemented during construction of the Connection Works. This included:</p> <ul style="list-style-type: none"> Fortnightly environmental inspections were conducted by the ESR. In addition the ESR also conducted a post significant rainfall inspection when required. TransGrid contracted Urban Perspectives to undertake the role of ESR and conduct the fortnightly inspections. A sample of inspection reports were reviewed by the auditors. The inspections were observed to be thorough and included photographs of issues identified requiring attention. For the selection reviewed, this included items such as housekeeping, spoil storage, sediment and erosion control and dust mitigation. The inspections were noted to follow up on previously identified issues and also monitored rehabilitation, heritage items, and weed management. Fortnightly inspections occurred on the same day as the sites fortnightly progress meetings allowing the ESR to be present in the progress and meeting and raise any identified environmental matters. Bi-monthly inspections of the connection works were undertaken by the Principal Engineers' Environmental Lead (Jacobs). A selection of these inspection reports were sighted by the auditors. The inspection reports included photographs of corrective items raised and of discussion items / site observations. Actions raised during the inspections were entered into an Environmental Actions Register and close out of actions tracked by Jacobs. <p>Various issues were raised through environmental inspections undertaken during the course of the connection works. Inspection reports detail follow up of identified issues and did not report any significant environmental incidents to have occurred. Error! Unknown document property name.</p>	
SH4COA2	<p>Adaptive Management: The Proponent must assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this approval and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation.</p> <p>Where an exceedance of these criteria and/or performance measures has occurred, the Proponent must, at the earliest opportunity:</p> <p>(a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur,</p> <p>(b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and</p> <p>(c) implement remediation measures as directed by the Secretary.</p>	<p>Schedule 3 includes criteria for operational noise and blasting. Operational noise requirements were yet to be triggered as operation of the wind farm had not commenced. Blasting criteria were not exceeded (refer to SH3COA 12).</p>	Compliant
SH4COA3	<p>Revision of Strategies, Plans and Programs: Within 3 months of the submission of:</p> <p>(a) an incident report under condition 5 below;</p> <p>(b) an audit report under condition 7 below; or</p> <p>(c) any modification to the conditions of this approval (unless the conditions require otherwise),</p> <p>the Proponent must review and, if necessary, revise the strategies, plans and programs required under this approval to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval.</p> <p>Note: This is to ensure strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</p>	<p>This requirement had not been triggered as no incidents threatening or causing material harm had been reported and no modification (post December 2016 which activated these conditions) had occurred. The submission of this audit report will trigger this requirement.</p>	Not triggered

Reference	Condition	Comments	Audit Finding
SH4COA4	Community Consultative Committee: From the commencement of construction, the Proponent must operate a Community Consultative Committee (CCC) for the project to the satisfaction of the Secretary, in accordance with the Community Consultative Committee Guidelines for State Significant Projects (2016) or its latest version.	Wind Farm Works AGL established the CCC in 2012 and held quarterly CCC meetings until 2013. In 2013 AGL tendered the Silverton wind farm project and then abandoned it and as a result the CCC meetings went from quarterly to half yearly. In Feb 2016 the CCC was reinvigorated and since then meetings have been held every 2 months. Minutes of the CCC meetings as well as the presentation provided to the CCC were available on the AGL Silverton Public Website.	Complaint
REPORTING			
SH4COA5	Incident Reporting: The Proponent shall immediately notify the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the project, the Proponent shall notify the Secretary and any other relevant agencies as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	Wind Farm Works CATCON's Hazard and Incident Register was reviewed by the auditors. No incidents which caused or threatened to cause material harm to the environment were recorded during wind farm works. This was also supported by site interviews. No observations during the site inspection indicated incidents (as defined in the Project Approval) having had occurred that would trigger report under the condition. The site has in place a Pollution Incident Response Management Plan and associated incident reporting process. At the time of the audit no incident that caused, or threatened to cause, material harm to the environment had been reported. Therefore the incident management and reporting requirements outlined in the Plan had not been triggered. Connection Works TransGrid's incident register was reviewed by the auditors. No incidents which caused or threatened to cause material harm to the environment were recorded during connection works. No observations during the site inspection indicated incidents having had occurred that would trigger report under the condition.	Not Triggered
SH4COA6	Regular Reporting: The Proponent must provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval.	Environmental content has been progressively updated to the website through the required management plans being uploaded as they have been approved by DPE. Project and Community updates are provided to the CCC as part of the CCC meeting presentations which are available on the AGL Silverton Wind Farm website. Whilst these updates may at times include discussion of environmental aspects, they are not considered to fulfil the requirement for regular reporting on environmental performance. The Wind Farm Works CEMP commits to reporting regularly to the Principal (AGL) via Weekly Site Progress Reports and Monthly Progress Reports. This includes reporting of issues, incidents, corrective actions relating to heritage and biodiversity matters. The CEMP does not discuss reporting to the public. It is understood that this would be AGL's responsibility. The Connection Works Construction Biodiversity Management Plan states that rehabilitation monitoring will be carried out monthly by the ESR and rehabilitation progress including details of the benchmarks and indicators reported following the monthly inspections. It is unclear who this reporting will be to. It is assumed to be from the ESR to TransGrid. The Plan does not specifically discuss reporting to the public. Again, it is understood that this would be AGL's responsibility. The Overview Environment Strategy prepared by AGL states that the project website will be updated to include regular reporting on environmental performance (as required by this COA) however does not detail what this will cover. Noting there has been environmental and community content included on the website, it does not specifically appear to address the key element of the condition that refers to environmental performance of the project. On this basis it is considered the project are Non-compliant with this condition. It is noted this condition is administrative in nature, and does not impact on the actual environmental performance of the project.	Non-compliant 2018 IEA REC 10 Provide regular reporting on environmental performance on the AGL Silverton Wind Farm website. 2018 IEA REC 11 Update the Overview Environmental Management Strategy to outline the environmental performance reporting which will be provided to the public as per the reporting arrangements in the various plans prepared for the Project.
AUDITING			

Reference	Condition	Comments	Audit Finding
SH4COA7	<p>Within 1 year of the commencement of construction, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:</p> <p>(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any relevant EPL/s;</p> <p>(d) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals; and</p> <p>(e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under these approvals.</p> <p>Note: This audit team must be led by a suitably qualified auditor and/or experts in any other fields specified by the Secretary.</p>	<p>a) The audit team was approved by the DPE by letter dated 17 April 2018.</p> <p>b) Consultation with the relevant agencies is provided in Section 4 of the main report.</p> <p>c) Detailed in this compliance checklist.</p> <p>d) Refer Section 6 of the main report</p> <p>e) Summarised in Section 7 of the main report.</p> <p>There was no requirement specified by the Secretary to include experts in any fields.</p>	Compliant
SH4COA8	<p>Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.</p>	<p>This requirement had not been triggered as submission of the report to the DPE will occur following final delivery of this report to AGL.</p>	Not Triggered
ACCESS TO INFORMATION			
SH4COA9	<p>The Proponent must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the project:</p> <ul style="list-style-type: none"> • the EA; • the final layout plans for the project; • current statutory approvals for the project; • approved strategies, plans or programs required under the conditions of this approval; • the proposed staging plans for the project if the construction, operation and/or decommissioning of the project is to be staged; • a comprehensive summary of the monitoring results of the project, which have been reported in accordance with the various plans and programs approved under the conditions of this approval; • a complaints register, which is to be updated on a monthly basis; • minutes of CCC meetings; • the annual Statement of Compliance with the EPL; • any independent environmental audit, and the Proponent's response to the recommendations in any audit; and • any other matter required by the Secretary; and <p>(b) keep this information up to date, to the satisfaction of the Secretary.</p>	<p>The following information was observed to be available on the AGL Silverton Wind Farm Website (viewed on 19.07.17):</p> <ul style="list-style-type: none"> • Environmental Assessments (including Mod 1, 2 & 3 EAs, response to submissions, assessment reports and determination reports) • Final Layout Plan (Rev 4). • Development Approval • Environmental Management Strategy and Plans • CCC meeting minutes • CCC meeting presentations which include a Project update and community issues • EPL Annual Returns <p>At the time of the audit majority of the monitoring requirements in the various plans and programs approved under the conditions of this approval had not been triggered. As such, monitoring results were not required to be uploaded on the website.</p>	Compliant
COMMUNITY ENHANCEMENT COMMITMENTS			
AP3COA1	<p>Silverton Community Fund: The Proponent will establish a Silverton Community Fund of \$15,000 per annum, with the objective to broaden the environmental and community benefits of the wind farm within the local Silverton Community (i.e. within 10 km of the project).</p>	<p>AGL has established a community fund program which commits to providing a minimum of \$15,000 per annum to the Silverton Community. In April 2018 AGL asked local community groups to apply for a grant under the AGL community grant program. An advertisement was placed in the local paper which announced the opening of applications and an announcement was made in the CCC meetings (April 2018 CCC meeting minutes).</p> <p>AGL received one application from the Silverton Village Committee, requesting funding for renovating the municipal chambers in Silverton. This proposal appeared to be well supported by the community (CCC meeting minutes and Presentation from 07 June 2018).</p> <p>Funding to the value of \$27,726.00 was provided (sighted Payment Claim Assessment form dated 19.06.18).</p>	Compliant

Reference	Condition	Comments	Audit Finding
AP3COA2	Silverton Community Fund: The Proponent will establish a structure for the administration of the Community Fund in consultation with the local community, in particular the Silverton Village Committee, CCC and Council. This will include: <ul style="list-style-type: none"> • development of guidelines and eligibility criteria for applicants wishing to apply for funding; • establishment of an independent panel made up of representatives of the Silverton local community, Silverton Village Committee, the CCC and the Proponent (if required); and • development of assessment criteria to be used by the panel to assess applications. 	The structure for the administration of the Community Fund is outlined in the document AGL's Local Community Investment Program (Silverton Community Fund) Guidelines'. This document outlines the application process, eligibility criteria and guidelines. The document states that applications will be reviewed and assessed by AGL's Silverton Community Fund assessment Committee, comprising a representative from AGL and local community members (including members of the CCC). The funding provided as part of the request to renovate the municipal chambers in Silverton (discussed under AP3COA1 above) demonstrated the process of administering the Silverton Community Fund.	Compliant
AP3COA3	Solar Silverton Program: The Proponent will offer solar power systems (sometimes call PV or photovoltaic – 5kW) for residences within 10 km of the project.	<p>The Solar Silverton Program is outlined within the Silverton Wind Farm Community Enhancement Program in which AGL commits to offering a 5kW solar PV system for leaseholders and residence within 10km of the Silverton wind farm. AGL, in its letter to the DPE dated 3 November 2017, committed to the installation of solar PV systems on all complying rooftops from mid-2018. AGL contracted an accredited solar panel installer 'Electric Air Solutions' to conduct inspections of property owner's residence (sighted AGL Consultation Register indicating inspections were conducted in December 2017 and January 2018).</p> <p>As detailed in the June 2018 CCC meeting minutes and the AGL Consultation Register, the solar panel installation commenced on 07 May 2018. As of 28 June 2018, 16 solar PV installations had occurred.</p> <p>AGL noted that solar power systems of 5kW and above are not always possible in rural areas due to technical factors such as the length of the consumer line and services line at each property, the presence of hazardous materials and the structural integrity of the residence roof.</p> <p>Where solar panels are not a viable option AGL has committed to investigating other options. AGL noted that it plans to consult with DPE with regards to this requirement.</p> <p>On the basis that AGL has committed to offering a solar PV system to residences within 10 km of the project as evidenced by arranging to have the properties inspected by the solar panel installer, this condition has been assessed as compliant despite the installation not always being possible.</p>	Compliant
AP3COA4	Solar Silverton Program: The Solar Silverton Program will commence at the start of construction and be completed within two years of completion of construction.	<p>Construction of wind farm works commenced in May 2017. The Solar Silverton Program was finalised in November 2017 and property inspections by Electric Air Solutions were conducted in December 2017 and January 2018. As detailed in the June 2018 CCC meeting minutes and the AGL Consultation Register the Solar Panel installation commenced on the 07 May 2018.</p> <p>In accordance with this requirement, AGL has until May 2019 to complete this Program. Whilst the Solar Silverton Program may not have commenced at the onset of construction it was evident that implementation of the program was underway at the time of the audit. As AGL has two years to complete the program, this condition will be better assessed during the next IEA period and as such has been assessed as not verified during this IEA.</p>	Not verified
AP3COA5	Solar Silverton Program: Due to the heritage qualities of Silverton, not all residences may be suitable for installation of solar equipment, and the Proponent will ensure heritage issues are taken into account.	<p>As per AP3COA3, not all residences were reported by AGL to be able to participate in the Solar Silverton Program due to technical or other issues.</p> <p>AGL received a copy of the Silverton Village Committee Draft Conservation Heritage Plan and reported that it took heritage values in to account when progressing solar installations with owners. It is also noted that the solar installations are reversible which aligns with the heritage development guidelines (Section 6(e) provided in the Draft Conservation Heritage Plan.</p>	<p>Compliant</p> <p>2018 IEA OFI 22 Update the Silverton Wind Farm Community Enhancement Program to discuss how heritage issues will be taken into account when assessing whether residences are suitable for the installation of solar equipment.</p>
AP3COA6	Water Tank Program: The Proponent will provide (on request) a domestic sized water tank to all inhabited residences within 10 km of the project.	<p>The Water Tank Program is detailed in the Silverton Wind Farm Community Enhancement Program. AGL commits to offering a domestic sized water tank to all inhabited residence within 10km of the project.</p> <p>As of June 2018, AGL was in the process of coordinating inspections of landowner's premises' in</p>	Compliant

Reference	Condition	Comments	Audit Finding
		<p>preparation for water tank installation. Inspections were being conducted by AGL and a contracted plumber 'Broken Hill Plumbing'. The aim of these inspections is to work out the best location for the water tanks to be installed and to ensure the water tanks are specific to each resident's wishes. Emails were reviewed which indicated that AGL was coordinating property inspections with the plumbing contractor (emails dated 12.06.18, 18.06.18 and 19.06.18).</p> <p>AGL had not installed any tanks at the time of the audit however a rolling installation was scheduled to occur in June-July 2018 following confirmation of tank locations and materials by the plumber. Residents had been informed of this process via CCC meetings (June CCC Meeting reviewed).</p>	
AP3COA7	Mobile Reception Program: The Proponent will undertake a feasibility study during the construction phase of the project for improving mobile reception for the Silverton community.	<p>The Mobile Reception Program is detailed in the Silverton Wind Farm Community Enhancement Program. AGL undertook a desktop assessment as part of an initial feasibility study. Results from this study were discussed at the November 2017 CCC Meeting. The Mobile Reception Program details that a 4GX solution can be offered by AGL working with Telstra, which would offer some mobile reception improvement across the local area. This offer involves the installation of a 20 metre monopole at Telstra's Silverton Exchange site.</p> <p>As per the June 2018 CCC meeting minutes, AGL was in the process of progressing an Enterprise Work Agreement (EWA) with Telstra.</p>	Compliant
AP3COA8	Mobile Reception Program: The Proponent will contribute up to \$50,000 for mobile reception improvement works or allow this \$50,000 (or the balance of funds) to be put towards other community improvement projects as agreed with the Silverton Village Committee.	<p>AGL was in the process of consulting with Telstra to implement the Mobile Reception Program, as detailed above for AP3COA7. At the time of the audit AGL was finalising the approval process with the Crown and the Silverton Village Committee in order to progress the program. Quantity of funds could not be confirmed due to the fact that the Program was still in its early stages at the time of the audit.</p>	Not verified

Silverton IEA Compliance Checklist – Environmental Protection Licence 20882

Reference	Condition	Comments	Audit Finding						
1 ADMINISTRATIVE CONDITIONS									
A1 What the licence authorises and regulates									
A1.1	<p>This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2:</p> <p>Construction and commission and operation of 58 wind turbines and associated infrastructure for electricity generation.</p>	At the time of the audit site inspection construction was in various stages at all 58 wind turbine locations.	Compliant						
TERMS OF APPROVAL									
A1.2	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Electricity generation</td><td>Electricity works (wind farms)</td><td>> 1000 - 4000 GWh annual generating capacity</td></tr></table>	Scheduled Activity	Fee Based Activity	Scale	Electricity generation	Electricity works (wind farms)	> 1000 - 4000 GWh annual generating capacity	As at June 2018, 21 of the final 58 wind turbines had reached mechanical completion. Wind turbine commissioning activities were being undertaken and 10 turbines had been fully commissioned. The operational phase of the project had not commenced.	Not triggered
Scheduled Activity	Fee Based Activity	Scale							
Electricity generation	Electricity works (wind farms)	> 1000 - 4000 GWh annual generating capacity							
A2 Premises or plant to which this licence applies									
A2.1	<p>The licence applies to the following premises:</p> <table><tr><th>Premises Details</th></tr><tr><td>SILVERTON WIND FARM</td></tr><tr><td>BARRIER RANGES</td></tr><tr><td>SILVERTON</td></tr><tr><td>NSW 2880</td></tr><tr><td>LOT 43 DP 760242, LOT 47 DP 760243, LOT 71 DP 760633, LOT 1772 DP 763691, LOT 2523 DP 764486, LOT 2524 DP 764487, LOT 2525 DP 764488, LOT 2526 DP 764489, LOT 5347 DP 768258, LOT 5348 DP 768259, LOT 5364 DP 768275, LOT 5365 DP 768276, LOT 5366 DP 768277, LOT 5373 DP 768284, LOT 5374 DP 768285, LOT 5379 DP 768290, LOT 5380 DP 768291, LOT 5381 DP 768292, LOT 5398 DP 768309, LOT 6481 DP 769310, LOT 6482 DP 769311</td></tr></table> <p>Note: The premises excludes the construction and operation of:</p> <p>1. The TransGrid 220kV transmission line and associated substation on part Lot 6481 DP 769310 and part Lot 47 DP 760243.</p>	Premises Details	SILVERTON WIND FARM	BARRIER RANGES	SILVERTON	NSW 2880	LOT 43 DP 760242, LOT 47 DP 760243, LOT 71 DP 760633, LOT 1772 DP 763691, LOT 2523 DP 764486, LOT 2524 DP 764487, LOT 2525 DP 764488, LOT 2526 DP 764489, LOT 5347 DP 768258, LOT 5348 DP 768259, LOT 5364 DP 768275, LOT 5365 DP 768276, LOT 5366 DP 768277, LOT 5373 DP 768284, LOT 5374 DP 768285, LOT 5379 DP 768290, LOT 5380 DP 768291, LOT 5381 DP 768292, LOT 5398 DP 768309, LOT 6481 DP 769310, LOT 6482 DP 769311	This is noted.	Noted
Premises Details									
SILVERTON WIND FARM									
BARRIER RANGES									
SILVERTON									
NSW 2880									
LOT 43 DP 760242, LOT 47 DP 760243, LOT 71 DP 760633, LOT 1772 DP 763691, LOT 2523 DP 764486, LOT 2524 DP 764487, LOT 2525 DP 764488, LOT 2526 DP 764489, LOT 5347 DP 768258, LOT 5348 DP 768259, LOT 5364 DP 768275, LOT 5365 DP 768276, LOT 5366 DP 768277, LOT 5373 DP 768284, LOT 5374 DP 768285, LOT 5379 DP 768290, LOT 5380 DP 768291, LOT 5381 DP 768292, LOT 5398 DP 768309, LOT 6481 DP 769310, LOT 6482 DP 769311									
A3 Information supplied to the EPA									
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	<p>The licence application was made available and sighted. The application references a Draft of the Project Approval as a key description for the project. MCW Environmental did not assess all aspects of the licence application or information on the application.</p> <p>This audit report assesses compliance with the Project Approval. On the basis of the observations made on site and the findings of this audit the project is considered to be generally compliant with the licence application. It is noted that a total of 170 turbines were included in the licence and only 58 were planned for construction.</p>	Compliant						
2 DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND									
P1 Location of monitoring/discharge points and areas									
P1.1	The following utilisation areas referred to in the table below are identified in this licence	EPL does not identify any utilisation areas.	Noted						

Reference	Condition	Comments	Audit Finding																																																							
	for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.																																																									
3 LIMIT CONDITIONS																																																										
L1 Pollution of waters																																																										
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	As per evidence against Project Approval 08_0022 SH3COA15. The site does not have authorised discharge points specified in EPL 20882. As part of weekly, monthly and bi-monthly inspections water pollution and water quality is generally inspected and reported on. Inspection results indicate that there have been no environmental incidents at the site which would have caused pollution to waterways. All creeks were dry during the site inspection. No incidents were recorded relating to water pollution	Compliant																																																							
L2 Waste																																																										
L2.1	The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.	EPL does not expressly permit any waste to be received at the premises. As per evidence against Project Approval 08_0022 SH3COA34, the auditors were informed that no waste generated outside the premises was received on site for storage, treatment, processing or disposal. Waste management and disposal of waste generated by the project is discussed further under Project Approval 08_0022 SH3COA34.	Compliant																																																							
L2.2	This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if those activities require an environment protection licence.	This is noted.	Noted																																																							
L3 Noise Limits																																																										
L3.1	<div>The licensee must ensure that the noise generated by the operation of wind turbines does not exceed the noise limits at the residential premises nominated in the table below.</div> <table><tr><th>Location</th><th colspan="10">dBA limit with reference to hub height wind speed</th></tr><tr><td>Metres per second</td><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td></td></tr><tr><td>VL - 9, 10, 11, 12, 14, 15, 16, 17a, 17b, 18, 19, 20, 21, 22, 24a, 24b, 25a, 25b, 28a, 28b, 29</td><td>35</td><td>35</td><td>35</td><td>35</td><td>35</td><td>35</td><td>35</td><td>36</td><td>38</td><td></td></tr><tr><td>VL 6</td><td>38</td><td>39</td><td>40</td><td>40</td><td>41</td><td>42</td><td>43</td><td>45</td><td>46</td><td></td></tr><tr><td>All other privately owned non-associated residential premises</td><td colspan="10">The higher of 35dB(A) or the existing background noise level plus 5 dB(A)</td></tr></table> <div>Note: To interpret the locations referenced in the table above see Appendix 2 of the Project Approval MP 08_0022 for the Silverton wind farm kept on EPA file DOC16/602345.</div>	Location	dBA limit with reference to hub height wind speed										Metres per second	4	5	6	7	8	9	10	11	12		VL - 9, 10, 11, 12, 14, 15, 16, 17a, 17b, 18, 19, 20, 21, 22, 24a, 24b, 25a, 25b, 28a, 28b, 29	35	35	35	35	35	35	35	36	38		VL 6	38	39	40	40	41	42	43	45	46		All other privately owned non-associated residential premises	The higher of 35dB(A) or the existing background noise level plus 5 dB(A)										The Wind Farm had not commenced operations at the time of the audit therefore these operational noise limits were yet to apply.	Not Triggered
Location	dBA limit with reference to hub height wind speed																																																									
Metres per second	4	5	6	7	8	9	10	11	12																																																	
VL - 9, 10, 11, 12, 14, 15, 16, 17a, 17b, 18, 19, 20, 21, 22, 24a, 24b, 25a, 25b, 28a, 28b, 29	35	35	35	35	35	35	35	36	38																																																	
VL 6	38	39	40	40	41	42	43	45	46																																																	
All other privately owned non-associated residential premises	The higher of 35dB(A) or the existing background noise level plus 5 dB(A)																																																									
L3.2	Noise generated by the operation of the wind turbines is to be measured in accordance with the relevant requirements of the South Australian Environment Protection Authority's South Australian Wind Farms - Environmental Noise Guidelines 2009 (or its latest version). If this guideline is replaced by an equivalent NSW guideline, then the noise generated is to be measured in accordance with the NSW guideline. Note: A 5dB(A) penalty applies separately for tonality and low frequency noise in accordance with the South Australian Wind Farms: Environmental Noise Guidelines 2009 (Modified). Modifications for tonality and low frequency are detailed in Appendix 4 of Project Approval MP 08_0022 kept on EPA file DOC16/602345.	The Wind Farm had not commenced operations at the time of the audit.	Not Triggered																																																							
L3.3	The licensee must ensure that the noise generated by the operation of ancillary infrastructure does not exceed a limit of 35dB(A) LAeq (15 minute) at any non-associated residential premises. Noise generated by the operation of ancillary infrastructure is to be measured in accordance with the relevant requirements of the	The Wind Farm had not commenced operations at the time of the audit.	Not Triggered																																																							

Reference	Condition	Comments	Audit Finding
	NSW Noise Policy for Industry (EPA, 2017). Note: The policy does not apply to construction and blasting activities at the premises.		
L4 Blasting			
L4.1	The overpressure level from blasting operations on the premises must not exceed 115dB (Lin Peak) for more than 5% of the total number of blasts over a period of 1 year.	This Condition mirrors Project Approval 08_0022 SH3COA12. <i>As per evidence against Project Approval 08_0022 SH3COA12.</i> Event Reports which included the pressure and ground vibration measured at the blast site were available for just under half of the blasts. A formula was applied by CATCON (as advised by Resonate Acoustics) to convert the pressure recordings (pascals) into sound pressure levels (dBL). After applying this calculation, two of the blasts recorded airblast overpressure levels greater than 120 dB(L) as measured at the blast location. An email from Resonate Acoustics (31.08.17) indicated that the actual overpressure at the nearest residence would be approximately 17dB lower than that measured at the monitor when adjusted for the attenuation of the overpressure over distance. CATCON applied the attenuation adjustment to all of the airblast overpressure results and none of the adjusted results exceeded the criteria when applying this attenuation approach. The ground vibration results reviewed were below the criteria. Whilst it is recognised that blast monitoring was not available for all blasts, based on the results available indicating that the criteria was easily met (when adjusted for sound pressure attenuation to the nearest non-associated residence) and that no complaints were received, this condition is considered compliant.	Compliant
L4.2	The overpressure level from blasting operations at the premises must not exceed 120dB (Lin Peak) at any time. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.		Compliant
L4.3	Ground vibration peak particle velocity from the blasting operations at the premises must not exceed 5mm per second for more than 5% of the total number of blasts over a period of 1 year.		Compliant
L4.4	Ground vibration peak particle velocity from the blasting operations at the premises must not exceed 10mm per second at any time. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.		Compliant
L5 Hours of operation			
L5.1	Standard construction hours Unless otherwise specified by any other condition of this licence, all construction activities are: a) restricted to between the hours of 7:00am and 6:00pm Monday to Friday; b) restricted to between the hours of 8:00am and 1:00pm Saturday; and c) not to be undertaken on Sundays or Public Holidays.	This Condition mirrors Project Approval 08_0022 SH3COA7. <i>As per evidence against Project Approval 08_0022 SH3COA7.</i> A number of construction activities were undertaken outside of these times, mostly relating to concrete pours and associated batching. GE-CATCON liaised directly with the EPA to notify work planned to be conducted outside of the prescribed hours. Emails sent to the EPA on 8 September 2017 and 19 June 2018 were sighted by the auditors. The EPA requested that it be notified if any noise complaints associated with the works were received. This was not triggered as no complaints were recorded for any of the out of hours works undertaken. Work conducted outside of prescribed hours was inaudible at non-associated residences (as determined using the noise calculator tool developed by Resonate Acoustics) and as such approval from DPE and EPA notification was not required.	Compliant
L5.2	Exemptions to standard construction hours The four categories of works that may be undertaken outside the standard hours of operation permitted by Condition L5.1 are: a) the delivery of oversized plant or structures that police or other authorised authorities determine require special arrangements to transport along public roads; b) emergency work to avoid the loss of lives or property, or to prevent environmental harm; c) works that are inaudible at the non-associated residences; or d) as otherwise approved by the Secretary of the Department of Planning and Environment. The licensee must notify the EPA within 24 hours of undertaking any works referred to in Condition L5.2.		Compliant
L6 Potentially offensive odour			
L6.1	No condition of this licence identifies a potentially offensive odour for the purposes of Section 129 of the Protection of the Environment Operations Act 1997. Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.	No complaints had been received with regards to odour from both the connection and wind farm works. In addition blasting fumes were minimal due to small charge and confined blasts.	Compliant
L7 Other limit conditions			
L7.1	The licensee must not construct any turbine greater than 180 metres in height - measured from ground level to the highest blade tip point.	This Condition mirrors Project Approval 08_0022 SH2COA7. <i>As per evidence against Project Approval 08_0022 SH2COA7.</i>	Compliant

Reference	Condition	Comments	Audit Finding
		<p>Drawing 444W3224, Rotor Outline Physical Specifications (GE, 20.01.2016) specifies the diameter of the blades as 130m.</p> <p>Drawing 200W4046, Steel Tower, (GE, 11.02.2015) states that the pole height from ground to tower centre is 110m and the distance from the ground to the blade tip in operation is 175m.</p>	
4 OPERATING CONDITIONS			
O1 Activities must be carried out in a competent manner			
O1.1	<p>Licensed activities must be carried out in a competent manner.</p> <p>This includes:</p> <p>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</p> <p>b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>	<p>a) At the time of the audit site inspection, construction of the majority of the civil, structural and electrical works had been completed with most of the remaining work relating to wind turbine installation and assembly. The storage of turbine components was observed to be carried out in a competent manner.</p> <p>Movement of turbine components was managed in accordance with the Traffic Management Plan and the Drivers Code of Conduct (refer to Project Approval 08_0022 SH3COA27).</p> <p>A visitor and contractor induction process was in place and followed, as verified by review of a sample of induction records.</p> <p>b) <i>As per evidence against Project Approval 08_0022 SH3COA34.</i></p> <p>General site waste is collected on site and taken to the Broken Hill City Council Landfill Depot. Induction records sighted by the auditors included reference to waste management. The GE-CATCON CEMP contains a specific objective to “minimise waste generated during construction”. Specific management measures were monitored during the weekly and monthly compliance inspections conducted by the CATCON HSE Advisor and Jacobs. Jacobs inspections reported examples of waste reuse on site such as re-use of bases of oversized wooden crates as waste bins for wood waste from turbine packaging.</p> <p>The site manages multiple Waste Tracking Registers (viewed by auditors) which include:</p> <ul style="list-style-type: none"> • Construction waste register • General waste register • Hydrocarbon waste register • Wastewater register <p>Evidence of waste segregation was observed during the audit site inspection such as collection of steel wastes.</p> <p>The majority of waste is classified as general waste and is taken to Broken Hill City Council Landfill Depot. Chemical waste will also go to Broken Hill City Council Landfill Depot.</p>	Compliant
O2 Maintenance of plant and equipment			
O2.1	<p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <p>a) must be maintained in a proper and efficient condition; and</p> <p>b) must be operated in a proper and efficient manner.</p>	<p>This Condition mirrors Project Approval 08_0022 SH2COA16.</p> <p><i>As per evidence against Project Approval 08_0022 SH2COA16.</i></p> <p>CATCON implements the following measures to ensure plant and equipment used on site is maintained and operated in a proper and efficient manner:</p> <ul style="list-style-type: none"> • It was reported that CATCON maintains a register of plant, equipment and assets which show plant history, service history and scheduled maintenance. • CATCON owned plant undergoes a Plant Risk Assessment (Form SF-27) prior to coming onto site. The Plant Risk Assessment for a 3.5 tonne telehandler was sighted by auditors (dated 18.05.17). The Assessment ticked that the plant had had its three monthly, annual and major 5 yearly inspection. • All plant arriving on site was reportedly inspected by a member of the HSE team or a Site Engineer with details recorded on the Plant Inspection Report. The auditors sighted a folder on site with examples of completed Plant Inspection Reports dating back to 15.05.17. The Reports were noted to include checks of noise levels, mechanical checks such as engine exhaust system, visible oil, diesel or hydraulic leaks, air cleaners and air box clean as well as noting the date of the next service. • CATCON conducts routine audits / walk arounds of its equipment. The walk around completed on the 29.03.18 was sighted and noted to checks and include photographs of hydraulic hoses, engine exhaust colour, hydraulic / transmission / engine oil / coolant leaks. 	Compliant

Reference	Condition	Comments	Audit Finding
		<ul style="list-style-type: none"> Plant operators are required to undergo a Verification of Competency. Examples of completed Verification of Competency forms were sighted by the auditors. 	
O3 Dust			
O3.1	Activities occurring in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.	<p><i>As per evidence against Project Approval 08_0022 SH3COA13.</i></p> <p>The auditors note that the site is located in a region that experiences prolonged periods without rain. As such, the area is commonly regarded as a dusty environment. Water use for dust suppression is utilised on an as needs basis due to the need to conserve water in drought like conditions.</p> <p>Monthly environmental inspections conducted by EHP considers dust. For example, report for March 2018 identifies issue of dust from stockpiles in Area 7 and recommends additional wetting down. The April 2018 report identifies excessive dust at the site entrance and recommends additional wetting down.</p> <p>CATCON also conduct weekly inspections of the site and tracks actions in the CATCON HSE Improvement Register. Excessive dust was identified being generated on four occasions during CATCONs inspections conducted on the 17.07.17, 22.09.17, 04.10.17 and 06.04.18. These actions were all closed out at the time of the audit and included ongoing monitoring of dust levels around the site.</p> <p>During a CCC Meeting a residence highlighted dust on the short Broken Hill bypass road. Water carts are used in the morning before shift times and in the afternoon prior to shifts concluding as a mitigation to prevent dust. This was observed during the site inspection on 19 June 2018.</p> <p>Controls include:</p> <ul style="list-style-type: none"> Sprinklers at batch plant (not sighted as decommissioned at time of audit inspection); Water carts on road surfaces (two on site during audit inspection) Site activities were modified on high wind day's e.g. mobile crusher was stopped for short periods on occasion (noted in inspection reports). Speed limit of 40km on site. On windy days, speed limit reduced to 20 km (broadcast on radio). <p>No complaints had been received with regards to air quality. In addition blasting fumes were minimal due to small charge and confined blasts.</p> <p>During the site inspection dusty conditions were encountered, noting the dry conditions. The dust was mainly observed from passing vehicles and winds were very light during the inspections. In non-drought conditions and an abundance of water supply, it would be expected that more frequent use of the water cart would occur. However, given the dire scarcity of water in the region at the time of the inspection, a pragmatic approach to this condition has been taken, and it is considered that dust mitigation is at a sensible level. On this basis CATCON are considered generally compliant with this condition.</p>	Compliant
O3.2	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	Induction slides were viewed by the auditors and include reference to covering loads. Most loads to site are equipment and often does not require covering. CATCON reported that there was little or no spoil imported to site with stone and fill made at the crushing plant on site.	Compliant
O4 Emergency response			
O4.1	The licensee must have adequate fire prevention measures in place and develop procedures to manage fires which must be documented in the Pollution Incident Response Management Plan prepared for the premises.	<p>A review of fire prevention measures was conducted by the auditors. Evidence from this review is detailed against Project Approval 08_0022 SH3COA32.</p> <p>It is noted that the auditors are not fire safety experts and as such are not suitably qualified to fully assess compliance with this condition or if the site has adequate fire prevention measures in place.</p> <p>The PIRMP was made available to auditors however was not assessed in detail as part of the audit. The PIRMP did include listing of safety equipment that did include fire extinguishers and measures for minimising the risk of fires.</p>	Not Assessed
O5 Waste management			
O5.1	The licensee must record the type and volume of all waste generated at the premises and ensure waste is only transported to a premises that can lawfully receive the waste.	<i>As per evidence against Project Approval 08_0022 SH3COA34.</i>	Compliant

Reference	Condition	Comments	Audit Finding
		<div>a) General site waste is collected on site and taken to the Broken Hill City Council Landfill Depot. Induction records sighted by the auditors included reference to waste management. The GE-CATCON CEMP contains a specific objective to “minimise waste generated during construction”. Specific management measures were monitored during the weekly and monthly compliance inspections conducted by the CATCON HSE Advisor and Jacobs. Jacobs inspections reported examples of waste reuse on site such as re-use of bases of oversized wooden crates as waste bins for wood waste from turbine packaging.</div> <div>b) The site manages multiple Waste Tracking Registers (viewed by auditors) which include:<ul style="list-style-type: none">Construction waste registerGeneral waste registerHydrocarbon waste registerWastewater register</div> <div>c) Evidence of waste segregation was observed during the audit site inspection such as collection of steel wastes.</div> <div>d) The auditors were informed that no waste is received on site. The only items brought onto site are sand and gravel used for concrete.</div> <div>e) The majority of waste is classified as general waste and is taken to Broken Hill City Council Landfill Depot. Chemical waste will also go to Broken Hill City Council Landfill Depot.</div>	
5 MONITORING AND RECORDING CONDITIONS			
M1 Monitoring records			
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	EPL 20882 does not contain any monitoring parameters or frequencies. In addition there is no requirement to monitor assessable pollutants by the EPL.	Not Triggered
M1.2	All records required to be kept by this licence must be: <div>a) in a legible form, or in a form that can readily be reduced to a legible form;</div> <div>b) kept for at least 4 years after the monitoring or event to which they relate took place; and</div> <div>c) produced in a legible form to any authorised officer of the EPA who asks to see them.</div>		Not Triggered
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: <div>a) the date(s) on which the sample was taken;</div> <div>b) the time(s) at which the sample was collected;</div> <div>c) the point at which the sample was taken; and</div> <div>d) the name of the person who collected the sample.</div>		Not Triggered
M2 Recording of pollution complaints			
M2.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	AGL has implemented a complaints management process however during the audit period no environmental related complaints had been recorded or reported to have been received by AGL or CATCON.	Not Triggered
M2.2	The record must include details of the following: <div>a) the date and time of the complaint;</div> <div>b) the method by which the complaint was made;</div> <div>c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;</div> <div>d) the nature of the complaint;</div> <div>e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and</div> <div>f) if no action was taken by the licensee, the reasons why no action was taken.</div>		Not Triggered
M2.3	The record of a complaint must be kept for at least 4 years after the complaint was made.		Not Triggered
M2.4	The record must be produced to any authorised officer of the EPA who asks to see them.		Not Triggered
M3 Telephone complaints line			

Reference	Condition	Comments	Audit Finding
M3.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	AGL operates a Community Information and Complaints line and is set up to receive complaints for the project. The AGL website indicates the following: <i>"If you would like to enquire or make a complaint about Silverton Wind Farm, please feel free to contact us via the following channels: AGL Community Complaints & Enquiries Hotline: 1800 039 600 Email: AGLCommunity@agl.com.au Mail: AGL Community Complaints & Enquiries, Locked Bag 3013, Australia Square NSW 1215 You can find out more about how AGL engages with the community here and access the Community Complaints and Feedback Policy here."</i>	Compliant
M3.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	The community information and complaints line is advertised on the Silverton Wind Farm website and is discussed in the CCC meetings.	Compliant
M3.3	The preceding two conditions do not apply until 3 months after the date of the issue of this licence.	This is noted.	Noted
6 REPORTING CONDITIONS			
R1 Annual return documents			
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.	The following Annual Returns were submitted in the audit period: <ul style="list-style-type: none"> Annual Return (11 Jan 2017 – 13 July 2017) Annual Return (14 July 2017 – 10 January 2018) Both Annual Returns contained the required information however it is noted: <ul style="list-style-type: none"> Nil complaints were received during the reporting periods of both Annual returns; No monitoring point summaries are required. All conditions of the EPL were reported as compliant in both Annual Returns. No Load-based fee calculations are required as there is no required to monitor assessable pollutants by the EPL. 	Compliant
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Refer evidence against Condition R1.3.	Compliant
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.	EPL ownership was transferred from AGL to CATCON in July 2017. An Annual Return was prepared by AGL for the period 11 Jan 2017 – 13 July 2017. CATCON prepared an Annual Return for the period 14 July 2017 – 10 January 2018. CATCON will be responsible for developing the next Annual Return for the period 11 January 2018 – 10 January 2019 unless the licence is transferred to GE before this date.	Compliant
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	No licence surrender or revocation has occurred	Not Triggered.
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	As per the EPA website, the AGL Annual return was received on 7 September 2017. The EPL was transferred through application 1553885 which was approved on 07-Jul-2017, and came into effect on 14-Jul-2017. CATCON submitted the 2017/18 Annual Return to the EPA on 29 January 2018. Based on the dates indicated on the EPA website, the Annual Returns were supplied to the EPA within the timeframes required of the condition.	Compliant
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Annual Returns are available on the Silverton Public website.	Compliant
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the	The signed Annual Returns were sighted by the auditors. Both Annual returns were signed by a	Compliant

Reference	Condition	Comments	Audit Finding
	Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Director of AGL and CATCON respectively and witnessed appropriately.	
R2 Notification of environmental harm			
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	CATCON's Hazard and Incident Register was reviewed by the auditors. No incidents which caused or threatened to cause material harm to the environment were recorded during wind farm works. This was also supported by site interviews. No observations during the site inspection indicated incidents (as defined in the Project Approval) having had occurred that would trigger notification to be made to the EPA.	Not Triggered
R3 Written report			
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	The auditors were informed that Silverton Wind Farm had not received a request from an officer of the EPA to provide a written report in response to any identified event at the premises. During discussions with the EPA no mention was made by the EPA of any incident having occurred.	Not Triggered
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.		Not Triggered
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.		Not Triggered
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.		Not Triggered
7 GENERAL CONDITIONS			
G1 Copy of licence kept at the premises or plant			
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	A copy of the licence was available on site. A link to the EPL via the EPA website is provided on Silverton Wind Farm Project website.	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Copies of the licence were observed to be available on-site and able to be provided to an authorised officer of the EPA upon request. This had not been requested at the time of the audit.	Compliant
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	A copy of the licence was available on site. The project reported that the licence is routinely kept at the site and is available for inspection. A link to the EPL is also available on the AGL website and internal intranet.	Compliant
8 SPECIAL CONDITIONS			
E1 Post commission noise monitoring			
E1.1	Within 6 months of the commencement of operations the licensee must: a) undertake noise monitoring to determine whether the premises is complying with noise limits at L3.1; and b) submit a report of the noise monitoring results to the EPA.	Site had not commenced full operations at the time of the audit.	Not Triggered

Appendix B

NSW DPE Auditor Approval



Adam Mackett
Project Management Office – Group Operations
AGL Energy Limited
L24, 200 George Street
SYDNEY NSW 2000

Contact: Dr Paul Rutherford
Phone: 02 6229 7907
Email: compliance@planning.nsw.gov.au
Our Ref: 08_0022

Attention:

Melissa Ryan
Project Coordinator
Silverton Wind Farm
MRyan2@agl.com.au
AMackett@agl.com.au

Dear Ms Ryan,

**Independent Environmental Audit
Silverton Wind Farm – Project Approval 08_0022**

I refer to your email dated 10 April 2018 seeking the Secretary's endorsement for an audit team to undertake an Independent Environmental Audit (*audit*) under Project Approval No 08_0022 (*the approval*) for the Silverton Wind Farm Project.

Having considered the qualifications and experience of the proposed audit team, the Secretary endorses the appointment of:

- Michael Woolley (lead auditor);
- Kate Michelmores;
- Helen Onus; and
- David Stafford

to undertake the audit in accordance with Condition 7 of Schedule 4 of the approval.

This endorsement is conditional on the audit team being independent of the development.

The audit is to be conducted in accordance with AS/NZS ISO 19011 *Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing* and the *Post-approval requirements for State significant developments – Independent Audit Guideline* dated October 2015.

The audit report is to:

- include a compliance table indicating the compliance status of each condition of the approval and any relevant EPL;
- not use the term "partial compliance";
- recommend actions in response to non-compliances;
- review the adequacy of any approved strategy, plan or program required under

the approval; and

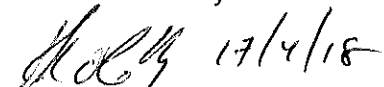
- recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under the approval.

In accordance with Condition 8 of Schedule 4 of the approval, within 3 months of commissioning the audit AGL must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

Prior to submitting the audit report to the Secretary, it is recommended that AGL review the report to ensure it complies with the relevant consent condition

Should you wish to discuss this matter please contact Dr Paul Rutherford on the details above.

Yours sincerely

Handwritten signature of Katrina O'Reilly in black ink, with the date 17/4/18 written to the right of the signature.

Katrina O'Reilly

Team Leader Compliance

As nominee for the Secretary

Appendix C

Independent Audit Declaration Form

Appendix C – Independent Audit Declaration Form Template

Independent Audit Declaration Form

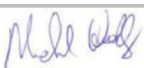
Project Name	Silverton Wind Farm
Consent Number	Project Approval 08_0022
Description of Project	Construction and Operation of a Wind Farm and Connection Works near Silverton NSW
Project Address	Barrier Range, Silverton NSW
Proponent	The Proponent as named on the Project Approval is Silverton Wind Farm Developments Pty Ltd. However AGL is delivering the Silverton Wind Farm project as agent for and on behalf of the project owner, PARF
Title of Audit	Independent Environmental Audit 2018 Silverton Wind Farm
Date	28 August 2018

I declare that I (with other auditors as nominated in the audit report) have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- the audit has been undertaken in general accordance with relevant condition(s) of consent and the *Post Approval Guidelines - Independent Audits (2015)*;
- the findings of the audit are reported truthfully, accurately and completely being based on observations made during the audit and documents provided by the Project;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor	Michael Woolley
Signature	
Qualification	Lead Auditor Certification – Exemplar Global
Company	MCW Environmental Consulting Pty Limited